

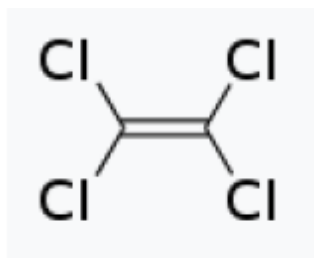


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## Draft Risk Evaluation for Perchloroethylene (Ethene, 1,1,2,2-Tetrachloro)

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CASRN: 127-18-4



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854

855 **Docket**

856 Supporting information can be found in public docket: [EPA-HQ-OPPT-2016-0732](#).

857

858 **Disclaimer**

859 Reference herein to any specific commercial products, process or service by trade name, trademark,  
860 manufacturer or otherwise does not constitute or imply its endorsement, recommendation or favoring by  
861 the United States Government.

862

863

**ABBREVIATIONS**


---

°C	Degrees Celsius
µg	Microgram(s)
1-BP	1-Bromopropane
1Q10	Lowest 1-day average flow that occurs (on average) once every 10 years
30Q5	Lowest 30-day average flow that occurs (on average) once every 5 years
7Q10	Lowest 7-day average flow that occurs (on average) once every 10 years
AAP	Alanine aminopeptidase
ABC	ATP Binding Cassette
AC	Acute Concentration
ACGIH <sup>®</sup>	American Conference of Government Industrial Hygienists
ADC	Average Daily Concentrations
ADME	Absorption/Distribution/Metabolism/Elimination
ADR	Acute Dose Rate
AEGL	Acute Exposure Guideline Level
AF	Assessment Factor
ALS	Amyotrophic Lateral Sclerosis
ALT	Aminotransferase
AML	Acute Myeloid Leukemia
ANCA	Antineutrophil-Cytoplasmic Antibody
APF	Assigned Protection Factor
ASD	Autism Spectrum Disorder
Atm	Atmosphere(s)
ATSDR	Agency for Toxic Substances and Disease Registries
AUC	Area Under the Curve
Avg	Average
BAF	Bioaccumulation Factor
BCF	Bioconcentration Factor
BIOWIN	EPI Suite biodegradation module
BLS	US Bureau of Labor Statistics
BMD	Benchmark Dose
BMDL/BMCL	Benchmark Dose/Concentration Lower Bound
BMR	Benchmark Dose Response
BW	Body Weight
CAA	Clean Air Act
CARB	California Air Resources Board
CASRN	Chemical Abstracts Service Registry Number
CBI	Confidential Business Information
CCI	Color Confusion Index
CCL <sub>4</sub>	Carbon Tetrachloride
CD	Cluster of Differentiation
CDC	Centers for Disease Control
CDR	Chemical Data Reporting

CDSMF	California Death Statistical Master File
CEHD	Chemical Exposure Health Data
CEM	Consumer Exposure Model
CEPA	Canadian Environmental Protection Agency/Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CF	Conversion Factor
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CHIRP	Chemical Risk Information Platform
ChV	Chronic Toxicity Value
CI	Confidence Interval
cm <sup>3</sup>	Cubic Centimeter(s)
CNS	Central Nervous System
CoA	Coenzyme A
COC	Concentration of Concern
COPD	Chronic Obstructive Pulmonary Disease
CoRAP	Community Rolling Action Plan
COU	Condition of Use
cP	Centipoise
CPCat	Chemical and Product Categories
CPS	Current Population Survey
CPSC	Consumer Product Safety Commission
CSCL	Chemical Substances Control Law
CT	central tendency
CWA	Clean Water Act
CYP	Cytochrome P
DCA	Dichloroacetic Acid
DF	Dilution Factor
DLBCL	Diffuse Large B-cell Lymphoma
DMR	Discharge Monitoring Report
DNA	Deoxyribonucleic Acid
DNAPL	Dense Non-Aqueous Phase Liquid
DNP	Dinitrophenol
DoD	Department of Defense
DQE	Data Quality Evaluation
EC50	Half Maximal Effective Concentration
ECHA	European Chemicals Agency
ECHO	Enforcement and Compliance History Online
ECOTOX	ECOTOXicology knowledgebase
EDC	Ethylene Dichloride
EEG	Electrocochleogram
E-FAST	Exposure and Fate Assessment Screening Tool
EG	Effluent Guidelines

ELCR	Excess Lifetime Cancer Risk
EPA	Environmental Protection Agency
EPANET	EPA water distribution system model
EPCRA	Emergency Planning and Community Right-to-Know Act
EPI Suite	Estimation Programs Interface (EPI) Suite
ESD	Emission Scenario Documents
EU	European Union
FDA	Food and Drug Administration
FFDCA	Federal Food, Drug and Cosmetic Act
FHSA	Federal Hazardous Substance Act
FIFRA	Federal Insecticide, Fungicide and Rodenticide Act
FR(s)	Federal Regulation
G	Gram(s)
GACT	Generally Available Control Technology
GD	Gestation Day
GIS	Geographical Information System
GM	Geometric Mean
GPS	Global Positioning System
GS	Generic Scenario
GSD	Geometric Standard Deviation
GSH	Glutathione
GST	Glutathione S-transferase
HAP	Hazardous Air Pollutant
HCFC	Hydrochlorofluorocarbon
HCl	Hydrochloric Acid
HE	High End
HEC	Human Equivalent Concentration
HED	Human Equivalent Dose
HERO	Health and Environmental Research Online (database)
HFC	Hydrofluorocarbon
HPV	High Production Volume
Hr	Hour(s)
HRs	Hazard Ratios
HSIA	Halogenated Solvents Industry Association
HUC	Hydrologic Unit Codes
i.p.	Intraperitoneal
IARC	International Agency for Research on Cancer
ICD	International Classification of Diseases
IDLH	Immediately Dangerous to Life and Health
IgA	Immunoglobulin A
IgE	Immunoglobulin E
IRIS	Integrated Risk Information System
IRTA	Institute for Research and Technical Assistance

ISHA	Industrial Safety and Health Act
IUR(s)	Inhalation Unit Risk(s)
kg	Kilogram(s)
L	Liter(s)
LADC	Lifetime Average Daily Concentration
lb	Pound(s)
LC50	Lethal Concentration 50
LDH	Lactate Dehydrogenase
LOAEC	Lowest Observable Adverse Effect Concentration
LOAEL	Lowest Observed Adverse Effect Level
LOD	Limit of Detection
LOEC	Lowest Observed Effect Concentration
Log $K_{oc}$	Logarithmic Organic Carbon:Water Partition Coefficient
Log $K_{ow}$	Logarithmic Octanol:Water Partition Coefficient
$m^3$	Cubic Meter(s)
MACT	Maximum Achievable Control Technology
Max.	Maximum
MCCEM	Multi-Chamber Concentration Exposure Model
MCL	Mononuclear Cell Leukemia (Hazard sections)
MCL	Maximum Contaminant Level (Surface Water sections)
MCLG	Maximum Contaminant Level Goal
MF	Mycosis Fungoides
Mfg	Manufacturing
mg	Milligram(s)
Min	Minute
Min.	Minimum
MLD	Million Liters per Day
MM	Multiple Myeloma
mmHg	Millimeter(s) of Mercury
MOA	Mode of Action
MOE	Margin of Exposure
mRNA	Messenger RNA
MSDS	Material Safety Data Sheet
n	Number variable (also N)
N/A	Not Available; Not Applicable
NAAQS	National Ambient Air Quality Standards
NAC	National Advisory Committee
NAcTCVC	N-acetylate TCVC
NAG	N-acetyl glucuronidase
NAICS	North American Industry Classification System
NATA	National Air Toxics Assessment
NAWQA	National Water-Quality Assessment



NCEA	National Center for Environmental Assessment
NCHS	National Center for Health Statistics
ND	Non-detect
NDI	National Death Index
NEI	National Emissions Inventory
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHANES	National Health and Nutrition Examination Survey
NHD	National Hydrological Dataset
NHEXAS	National Human Exposure Assessment Survey
NHL	non-Hodgkin lymphoma
NICNAS	National Industrial Chemicals Notification and Assessment Scheme
NIH	National Institutes of Health
NIOSH	National Institute for Occupational Safety and Health
NITE	National Institute of Technology and Evaluation
NOACC	Nordic Occupational Cancer Study
NOAEC	No Observable Adverse Effect Concentration
NOAEL	No Observed Adverse Effect Level
NOEC	No Observable Effect Concentration
NOEL	No Observable Effect Level
NPDES	National Pollutant Discharge Elimination System
NPDWR	National Primary Drinking Water Regulations
NPL	National Priorities List
NR	Not Reported
NRC	National Research Council
NTP	National Toxicology Program
NWIS	National Water Information Systems
OAQPS	Office of Air Quality Planning and Standards
OCPSF	Organic Chemicals, Plastics and Synthetic Fibers
OCSPF	Office of Chemical Safety and Pollution Prevention
ODS	Ozone Depleting Substance
OECD	Organisation for Economic Co-operation and Development
OEHHA	Office of Environmental Health Hazard Assessment
OEL	Occupational Exposure Limit
OEM	Original Equipment Manufacturer
OES	Occupational Exposure Scenarios
ONU	Occupational Non-User
OPPT	Office of Pollution Prevention and Toxics
ORs	Odds Ratios
OSHA	Occupational Safety and Health Administration
OTPR	Oily Type Paint Removers
OTVD	Open Top Vapor Degreasing
PAPR	Power Air-Purifying Respirator
RPB	Retinol-binding protein

PBPK	Physiologically Based Pharmacokinetic
PBZ	Personal Breathing Zone
PCA	Passive Cutaneous Anaphylaxis
PCE	Perchloroethylene
PCO	Palmitoyl CoA Oxidation
PDM	Probabilistic Dilution Model
PECO	Populations, Exposures, Comparators and Outcomes
PEL	Permissible Exposure Limit
PESS	Potentially Exposed Susceptible Subpopulation
PF	Protection Factor
pH	Potential for Hydrogen (also Power of Hydrogen)
PND	Postnatal Day
POD	Point of Departure
POTW	Publicly Owned Treatment Works
PPAR $\alpha$	Peroxisome Proliferator-Activated Receptor alpha
ppb	Part(s) per Billion
PPE	Personal Protective Equipment
ppm	Part(s) per Million
P <sub>trend</sub>	P-value trend
PWS	Public Water System
RCRA	Resource Conservation and Recovery Act
RDD	Relative Delivered Dose
RESO	Receptors, Exposure, Setting (or Scenario), Outcome
RfC(s)	Reference Concentration(s)
RQ	Risk Quotient
RR	Risk Ratio
S <sub>9</sub>	Fraction of an organ tissue homogenate used in biological assays to add metabolic activity
SAR	Supplied-Air Respirator
SARA	Superfund Amendments and Reauthorization Act
SCBA	Self-Contained Breathing Apparatus
SCEs	Sister Chromatid Exchange(s)
SCHER	Scientific Committee on Health and Environmental Risks
SD	Standard Deviation
SDS	Safety Data Sheet
SDWA	Safe Drinking Water Act
SEMS	Superfund Enterprise Management System
SF	Stream Flow
SHIELD	School Health Initiative: Environment, Learning, Disease
SIC	Standard Industry Classification
SIDS	Screening Information Data Set
SIR	Standardized Incidence Ratios
SMR	Standard Mortality Ratio

SNAP	Significant New Alternatives Policy
SpERC	Specific Environmental Release Category
SSADMF	Social Security Administration Death Master File
STEL	Short-Term Exposure Limit
STEWARDS	USDA ARS Sustaining the Earth's Watersheds - Agricultural research Database System
STORET	EPA STORAge and RETrieval data warehouse
STP	Standard Temperature and Pressure
SUSB	U.S. Census Statistics of US Businesses
SWC	Surface Water Concentration
t <sub>1/2</sub>	Half-life
TCA	Trichloroacetic Acid
TCAC	Trichloroacetyl Chloride
TCCR	Transparent, Clear, Consistent, and Reasonable
TCE	Trichloroethylene
TCOH	Trichloroethanol
TCVC	S-(1,2,2-trichlorovinyl) cysteine
TCVCS	TCVC sulfoxide
TCVG	S-(1,2,2-trichlorovinyl) glutathione
TCVMA	N-acetyl-S-(trichlorovinyl)-l-cystine
TEAM	Total Exposure Assessment Methodology
TLV <sup>®</sup>	Threshold Limit Value
TRI	Toxics Release Inventory
TSCA	Toxic Substances Control Act
TTO	Total Toxic Organics
TWA	Time-Weighted Average
U.S.	United States
UFs	Uncertainty Factors
USGS	United States Geological Survey
VA	Veteran's Affairs
VACCR	Veteran's Affairs Central Cancer Registry
VOC	Volatile Organic Compound
WBC	White Blood Cells
WESTAT	National solvent usage survey ( <a href="#">Westat 1987</a> )
WHO	World Health Organization
WOE	Weight of Evidence
WQP	Water Quality Portal
WQX	Water Quality Exchange
WWR	Waste Water Release
WWTP	Wastewater Treatment Plants
Yr	Year(s)

866

## EXECUTIVE SUMMARY

---

867 This draft risk evaluation for perchloroethylene was performed in accordance with the Frank R.  
868 Lautenberg Chemical Safety for the 21st Century Act and is being disseminated for public comment and  
869 peer review. The Frank R. Lautenberg Chemical Safety for the 21st Century Act amended the Toxic  
870 Substances Control Act (TSCA), the Nation’s primary chemicals management law, in June 2016. As per  
871 EPA’s final rule, Procedures for Chemical Risk Evaluation Under the Amended Toxic Substances  
872 Control Act (82 FR 33726), EPA is taking comment on this draft, and will also obtain peer review on  
873 this draft risk evaluation for PCE. All conclusions, findings, and determinations in this document are  
874 preliminary and subject to comment. The final risk evaluation may change in response to public  
875 comments received on the draft risk evaluation and/or in response to peer review, which itself may be  
876 informed by public comments. The preliminary conclusions, findings, and determinations in this draft  
877 risk evaluation are for the purpose of identifying whether the chemical substance presents unreasonable  
878 risk of injury to health or the environment under the conditions of use, including unreasonable risk to a  
879 potentially exposed or susceptible subpopulation (PESS) in accordance with TSCA section 6, and are  
880 not intended to represent any findings under TSCA section 7.

881 PCE is subject to federal and state regulations and reporting requirements. PCE has been a reportable  
882 Toxics Release Inventory (TRI) chemical under Section 313 of the Emergency Planning and  
883 Community Right-to-Know Act (EPCRA) since 1987. It is designated a Hazardous Air Pollutant (HAP)  
884 under the Clean Air Act (CAA), and is a hazardous substance under the Comprehensive Environmental  
885 Response, Compensation and Liability Act (CERCLA). It is subject to National Primary Drinking Water  
886 Regulations (NPDWR) under the Safe Drinking Water Act (SDWA) and designated as a toxic pollutant  
887 under the Clean Water Act (CWA) and as such is subject to effluent limitations.

888 PCE is currently manufactured, processed, distributed, used, and disposed of as part of industrial,  
889 commercial, and consumer conditions of use. PCE has a wide-range of uses, including production of  
890 fluorinated compounds, and as a solvent in dry cleaning and vapor degreasing. A variety of consumer  
891 and commercial products use PCE such as adhesives (arts and crafts, as well as light repairs), aerosol  
892 degreasing, brake cleaners, aerosol lubricants, sealants, stone polish, stainless steel polish and other wipe  
893 cleaners (cleaners used for wiping surfaces). EPA evaluated the following categories of conditions of  
894 use: manufacturing; processing; distribution in commerce, industrial, commercial and consumer uses  
895 and disposal. The yearly aggregate production volume ranged from 388 to 324 million pounds between  
896 2012 and 2015.

897

### Approach

899 EPA used reasonably available information (defined in 40 CFR 702.33 as “*information that EPA*  
900 *possesses, or can reasonably obtain and synthesize for use in risk evaluations, considering the*  
901 *deadlines for completing the evaluation*”), in a fit-for-purpose approach, to develop a risk evaluation  
902 that relies on the best available science and is based on the weight of the scientific evidence. EPA used  
903 previous analyses as a starting point for identifying key and supporting studies to inform the exposure,  
904 fate, and hazard assessments. EPA also evaluated other studies published since the publication of  
905 previous analyses. EPA reviewed the information and evaluated the quality of the methods and  
906 reporting of results of the individual studies using the evaluation strategies described in Application of  
907 Systematic Review in TSCA Risk Evaluations ([U.S. EPA 2018b](#)).

908

909 In the problem formulation, EPA identified the conditions of use and presented three conceptual models  
910 and an analysis plan for this draft risk evaluation. These have been carried into the draft risk evaluation  
911 where EPA has quantitatively evaluated the risk to the environment and human health, using both  
912 monitoring data and modeling approaches, for the conditions of use (identified in Section 1.4.1 of this

913 draft risk evaluation) and exposure pathways within the scope of the risk evaluation. While PCE is  
914 present in various environmental media, such as groundwater, surface water, and air, EPA stated in the  
915 problem formulation that EPA did not expect to include in the risk evaluation certain exposure  
916 pathways that are under the jurisdiction of other EPA-administered statutes in this draft risk evaluation  
917 as described in Section 1.4.

918  
919 EPA quantitatively evaluated the risk to aquatic species from exposure to surface water from the  
920 manufacturing, processing, use, or disposal of PCE. EPA used environmental fate parameters,  
921 physical-chemical properties, modelling, and monitoring data to assess ambient water exposure to  
922 aquatic species. During the systematic review process, EPA identified and evaluated studies that  
923 warranted further evaluation. Therefore, exposures to aquatic organisms from ambient surface water,  
924 are assessed and presented in this draft risk evaluation and used to inform the risk determination.  
925 These analyses are described in Sections 2.1, 2.3, 4.1.

926  
927 EPA evaluated exposures to PCE in occupational and consumer settings for the conditions of use  
928 included in the scope of the risk evaluation, listed in Section 1.4 (Scope of the Evaluation). In  
929 occupational settings, EPA evaluated acute and chronic inhalation exposures to occupational users  
930 (workers) and occupational non-users (ONUs)<sup>1</sup>, and acute and chronic dermal exposures to workers.  
931 EPA used inhalation monitoring data from literature sources, where reasonably available and that met  
932 data evaluation criteria, as well as modeling approaches, where reasonably available, to estimate  
933 potential inhalation exposures. Dermal doses for workers were estimated in these scenarios since  
934 dermal monitoring data was not reasonably available. In consumer settings, EPA evaluated acute  
935 inhalation exposures to both consumers and bystanders, and acute dermal exposures to consumers.  
936 Inhalation exposures and dermal doses for consumers and bystanders in these scenarios was estimated  
937 since inhalation and dermal monitoring data were not reasonably available. These analyses are  
938 described in Section 2.4 of this draft risk evaluation.

939  
940 EPA reviewed the environmental hazard data using the data quality review evaluation metrics and the  
941 rating criteria described in the Application of Systematic Review in TSCA Risk Evaluations ([U.S. EPA  
942 2018b](#)). EPA concluded that PCE poses a hazard to environmental aquatic receptors with algae being the  
943 most sensitive taxa for exposures. The results of the environmental hazard assessment are in Section 3.1.

944  
945 EPA evaluated reasonably available information for human health hazards and identified hazard  
946 endpoints including acute and chronic toxicity for non-cancer effects and cancer. EPA used the  
947 Framework for Human Health Risk Assessment to Inform Decision Making ([U.S. EPA 2014c](#)) to  
948 evaluate, extract, and integrate PCE's human health hazard and dose-response information. EPA  
949 reviewed key and supporting information from previous hazard assessments, EPA IRIS Toxicologic  
950 Review ([U.S. EPA 2012e](#)), an ATSDR Toxicological Profile ([ATSDR 2019](#)), AEGL ([NAC/AEGL  
951 2009](#)), and other international assessments listed in Table 1-3. EPA also screened and evaluated new  
952 studies that were published since these reviews (i.e., from 2012 – 2018).

953  
954 EPA developed a hazard and dose-response analysis using endpoints observed in inhalation and oral  
955 hazard studies, evaluated the weight of the scientific evidence considering EPA and National Research  
956 Council (NRC), risk assessment guidance and selected the points of departure (POD) for acute and  
957 chronic, non-cancer endpoints, and inhalation unit risk and cancer slope factors for cancer risk  
958 estimates. Potential health effects of PCE exposure analyses are described in Section 3.2.

959

---

<sup>1</sup> ONUs are workers who do not directly handle PCE but perform work in an area where PCE is present.

960 **Risk Characterization**

961 *Environmental Risk*

962 For environmental risk, EPA utilized a risk quotient (RQ) to compare the environmental concentration  
963 to the effect level to characterize the risk to aquatic organisms. The results of the risk characterization  
964 are in Section 4.1, including a table that summarizes the RQs for acute and chronic risks.

965  
966 EPA identified expected environmental exposures for aquatic species under the conditions of use in the  
967 scope of the risk evaluation. The estimated releases from specific facilities result in modeled surface  
968 water concentrations that were equal to or exceed the aquatic benchmark ( $RQ \geq 1$ ) for seven conditions  
969 of use, indicating that exposures resulting from environmental concentrations were greater than the  
970 effect concentration or the concentration of concern. Details of these estimates are in Section 4.1.2.

971  
972 *Human Health Risks*

973 Risks were estimated following both acute and chronic exposure for representative endpoints from  
974 every hazard domain. EPA identified potential cancer and non-cancer human health risks. The studies  
975 that support the health concerns address neurotoxicity (CNS) effects from acute exposures, and  
976 neurological, kidney, liver, immune system and developmental effects from chronic exposures and  
977 cancer.

978  
979 EPA estimated risk to workers from inhalation and dermal exposures, and risk to occupational non-  
980 users (ONUs) from inhalation exposures by comparing the estimated exposures to acute and chronic  
981 human health hazards For workers and ONUs, EPA estimated the cancer risk as the product of the  
982 chronic exposure to PCE and the inhalation Unit Risk value for each COU. For dermal exposure to  
983 workers, cancer risk was estimated as the product of the dermal exposure and the cancer slope factor for  
984 each COU. For workers and ONUs, EPA estimated exposure and used the MOE approach to assess the  
985 margin of exposure (MOE) for non-cancer health effects. For workers, EPA estimated risks using  
986 several occupational exposure scenarios, which varied assumptions regarding the use of personal  
987 protective equipment (PPE) for respiratory and dermal exposures for workers directly handling PCE.  
988 More information on respiratory and dermal protection, including EPA's approach regarding the  
989 occupational exposure scenarios for PCE, is in Section 2.4.1.

990  
991 For occupational scenarios, using the MOE approach for non-cancer endpoints, risks were indicated for  
992 all conditions of use, except for use of laboratory chemicals, under high-end inhalation or dermal  
993 exposure scenarios if PPE was not used. For the majority of exposure scenarios, risk to workers were  
994 identified for multiple endpoints in both acute and chronic exposure scenarios. Based on the PODs  
995 selected from among the acute and chronic endpoints, acute and chronic non-cancer and cancer risks  
996 were indicated for all but one exposure scenarios and occupational conditions of use under high-end  
997 inhalation or dermal exposure levels without the use of PPE. Use of PPE during the assessed conditions  
998 of use is expected to reduce worker exposure. This resulted in fewer conditions of use with estimated  
999 risks for acute, chronic non-cancer, or cancer inhalation or dermal exposures. With assumed use of  
1000 respiratory protection, cancer risks from chronic inhalation exposures were not indicated for most  
1001 conditions of use. With assumed use of dermal protection, acute, chronic non-cancer, and cancer risks  
1002 were not indicated for some conditions of use. However, some conditions of use continued to present  
1003 non-cancer inhalation risks to workers under high end occupational exposure scenarios even with  
1004 assumed PPE (i.e., respirators APF 10, 25 or 50). EPA's estimates for worker risks for each  
1005 occupational exposure scenario are presented in Section 4.2.1 and summarized in Table 4-112.

1006  
1007 ONUs are expected to have lower exposure levels than workers in most instances but exposures could

not always be quantified based on reasonably available data and risk estimates for ONUs may be similar to workers in some settings. While the difference between the exposures of ONUs and the exposures of workers directly handling PCE generally cannot be quantified, ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical. In these instances, EPA considered the ONU exposures to be equal to the central tendency risk estimates for workers when determining ONU risk attributable to inhalation. While this is likely health protective as it assumes ONU exposure is as high as it is for the majority of workers (greater numbers are likely to be exposed near the middle of the distribution), this is uncertain. Dermal exposures are not expected because ONUs do not typically directly handle PCE, nor they are in the immediate proximity of PCE.

Based on central-tendency exposure levels, acute and chronic non-cancer risks to ONUs were indicated for the majority of exposure scenarios. ONUs are not assumed to be using PPE to reduce exposures to PCE used in their vicinity. ONUs are not expected to be dermally exposed to PCE and therefore dermal risks to ONUs were not assessed. EPA's estimates for ONU risks for each occupational exposure scenario are presented alongside worker risk estimates in Section 4.2.2.

EPA also evaluated the risk to consumers from inhalation and dermal exposures, and to bystanders, from inhalation exposures, by comparing the estimated exposures to acute human health hazards. For consumers and bystanders for consumer use, EPA estimated non-cancer risks resulting from acute inhalation or dermal exposures that were modeled with a range of user intensities, described in detail in Section 2.4.1.30. EPA assumed that consumers or bystanders would not use PPE and that all exposures would be acute rather than chronic.

For consumer users and bystanders, risks identified for acute exposures were indicated for some conditions of use. For consumers, medium and high intensity acute inhalation and dermal exposure scenarios indicated risk. Conditions of use that indicated risks following acute exposures to consumer users (for inhalation and dermal exposure) also indicated risks to bystanders (primarily for inhalation exposures only). One scenario, dry cleaning solvent, presented risks for bystanders in the dermal scenario. Some consumer conditions of use did not indicate risks for consumer or bystanders. EPA's estimates for consumer and bystander risks for each consumer use exposure scenario are presented in Section 4.2.4 and summarized in Table 4-113 in Section 4.5.2.

#### ***Uncertainties***

Key assumptions and uncertainties in the environmental risk estimation include the uncertainty around modeled releases that have surface water concentrations greater than the highest concentration of concern for algae. Data were reasonably available for three algal species and may not represent the most sensitive species at a given site. For the human health risk estimation, key assumptions and uncertainties are related to the estimates for ONU inhalation exposures because monitoring data were not reasonably available for many of the conditions of use evaluated. Assumptions and key sources of uncertainty for consumer exposure are detailed in Section 2.4.2.3 for consumer products, Section 2.4.2.4 for consumer articles, and Section 2.4.2.6 for overarching uncertainties.

#### ***Potentially Exposed and Susceptible Subpopulations***

TSCA sec. 6(b)(4) requires that EPA evaluate risk to relevant potentially exposed or susceptible subpopulations (PESS). TSCA sec. 3(12) states that “[t]he term ‘potentially exposed or susceptible subpopulation’ means a group of individuals within the general population identified by the Administrator who, due to either greater susceptibility or greater exposure, may be at greater risk than the general population of adverse health effects from exposure to a chemical substance or mixture, such as infants, children, pregnant women, workers, or the elderly.”

1057  
1058 In developing the risk evaluation, EPA analyzed the reasonably available information to ascertain  
1059 whether some human receptor groups may have greater exposure or greater susceptibility than the  
1060 general population to the hazard posed by a chemical. For consideration of the most highly exposed  
1061 groups, EPA considered PCE exposures among both workers using PCE and ONUs in the vicinity of  
1062 PCE use to be higher than the exposures experienced by the general population. Consumer users and  
1063 bystanders are also expected to be more highly exposed than the general population. Potentially  
1064 susceptible subpopulations include the developing fetus (and by extension, women of childbearing  
1065 age) as well as those with pre-existing health conditions, higher body fat content, or particular genetic  
1066 polymorphisms.

### 1067 ***Aggregate and Sentinel Exposures***

1068 Section 6 of TSCA requires the EPA, as a part of the risk evaluation, to describe whether aggregate or  
1069 sentinel exposures under the conditions of use were considered and the basis for their consideration. The  
1070 EPA has defined aggregate exposure as “*the combined exposures to an individual from a single*  
1071 *chemical substance across multiple routes and across multiple pathways*” (40 CFR § 702.33).  
1072 Exposures to PCE were evaluated by inhalation and dermal routes separately. Inhalation and dermal  
1073 exposures are assumed to occur simultaneously for workers and consumers. EPA chose not to utilize  
1074 additivity of exposure pathways at this time within a condition of use because of the uncertainties  
1075 present in the current exposure estimation procedures and this may lead to an underestimate of exposure.  
1076

1077 The EPA defines sentinel exposure as “*the exposure to a single chemical substance that represents the*  
1078 *plausible upper bound of exposure relative to all other exposures within a broad category of similar or*  
1079 *related exposures*” (40 CFR § 702.33). In this risk evaluation, the EPA considered sentinel exposure the  
1080 highest exposure given the details of the conditions of use and the potential exposure scenarios.  
1081  
1082

### 1083 **Risk Determination**

1084 In each risk evaluation under TSCA section 6(b), EPA determines whether a chemical substance  
1085 presents an unreasonable risk of injury to health or the environment, under the conditions of use. The  
1086 determination does not consider costs or other non-risk factors. In making this determination, EPA  
1087 considers relevant risk-related factors, including, but not limited to: the effects of the chemical substance  
1088 on health and human exposure to such substance under the conditions of use (including cancer and non-  
1089 cancer risks); the effects of the chemical substance on the environment and environmental exposure  
1090 under the conditions of use; the population exposed (including any potentially exposed or susceptible  
1091 subpopulations); the severity of hazard (including the nature of the hazard, the irreversibility of the  
1092 hazard); and uncertainties. EPA also takes into consideration the Agency’s confidence in the data used  
1093 in the risk estimate. This includes an evaluation of the strengths, limitations, and uncertainties associated  
1094 with the information used to inform the risk estimate and the risk characterization. The rationale for the  
1095 risk determination is discussed in Section 5.1.  
1096

### 1097 ***Environmental Risks***

1098 EPA evaluated environmental exposures for aquatic organisms and determined whether any risks are  
1099 unreasonable. The drivers for EPA’s draft determination of unreasonable risks to aquatic organisms are  
1100 immobilization from acute exposure, growth effects from chronic exposure, and mortality to algae.  
1101 Algae was assessed separately and not incorporated into acute or chronic COCs, because durations  
1102 normally considered acute for other species (e.g., 48, 72 hours) can encompass several generations of  
1103 algae. EPA estimated site-specific surface water concentrations for discharges using upper and lower  
1104 bounds for the range of predicted surface water concentrations. For the percentage of the chemical



1105 removed from wastewater during treatment before discharge to a body of water, EPA estimated 80%  
1106 removal of PCE from indirect discharging facilities and estimated 0% removal of PCE for direct releases  
1107 to surface water. PCE has low bioaccumulation potential and moderate potential to accumulate in  
1108 wastewater biosolids, soil, or sediment.

1109  
1110 For risks to the environment, EPA preliminarily determined that the conditions of use for PCE that  
1111 present unreasonable risks are processing as a reactant/intermediate, recycling, use as a processing aid in  
1112 petroleum production, and disposal. A full description of EPA's draft determination for each condition  
1113 of use is in Section 5.3.

#### 1114 1115 ***Risks of Injury to Health***

1116 EPA's draft determination of unreasonable risk for specific conditions of use of PCE listed below are  
1117 based on health risks to workers, occupational non-users, consumers, or bystanders from consumer use.  
1118 As described below, risks to general population were not evaluated. PCE has a large database of human  
1119 health toxicity data. For each hazard domain there are several endpoints, and often a single endpoint was  
1120 examined by multiple studies. The non-cancer effects selected for risk estimation were neurotoxicity (i.e.,  
1121 increased latencies for pattern reversal visual-evoked potentials) from acute exposure and multiple effects  
1122 including CNS, kidney, liver, immune system and developmental toxicity from repeated and chronic  
1123 exposures. The evaluation of cancer includes estimates of risk of lung and liver tumors.

#### 1124 1125 ***Risk to the General Population***

1126 General population exposures to PCE may occur from industrial and/or commercial uses; industrial  
1127 releases to air, water or land; and other conditions of use. As part of the problem formulation for PCE,  
1128 EPA found those exposure pathways are covered by other statutes and consist of: the ambient air  
1129 pathway (i.e., PCE is listed as a hazardous air pollutant (HAP) in the Clean Air Act (CAA)), the  
1130 drinking water pathway (i.e., National Primary Drinking Water Regulations (NPDWRs) are promulgated  
1131 for PCE under the Safe Drinking Water Act), ambient water pathways (i.e., PCE is a priority pollutant  
1132 with recommended water quality criteria for protection of human health under the CWA), and disposal  
1133 pathways (RCRA and SDWA regulations minimize further environmental exposure and associated risks  
1134 related to the disposal of PCE). As described in the problem formulation for PCE, other environmental  
1135 statutes administered by EPA adequately assess and effectively manage these exposures. EPA believes  
1136 that the TSCA risk evaluation should focus on those exposure pathways associated with TSCA  
1137 conditions of use that are not subject to the regulatory regimes discussed above because those pathways  
1138 are likely to represent the greatest areas of concern to EPA. Therefore, EPA did not evaluate hazards or  
1139 exposures to the general population in this risk evaluation, and there is no risk determination for the  
1140 general population.

#### 1141 1142 ***Risk to Workers***

1143 EPA evaluated workers' acute and chronic inhalation and dermal exposures for cancer and non-cancer  
1144 risks and determined whether any risks are unreasonable. The drivers for EPA's draft determination of  
1145 unreasonable risk for workers are neurotoxicity from acute and chronic inhalation exposures,  
1146 neurotoxicity from chronic dermal exposures, and cancer resulting from chronic inhalation and dermal  
1147 exposures.

1148  
1149 The determinations reflect the effects associated with the occupational exposures to PCE and  
1150 incorporate consideration of assumed PPE (frequently estimated to be a respirator of APF 10, 25, or 50  
1151 and gloves with PF 5, 10, or 20). Some conditions of use did not assume the use of respiratory PPE. For  
1152 workers, EPA determined that all applicable conditions of use for PCE presented unreasonable risks,  
1153 except for distribution in commerce, the industrial use of lubricants and greases (e.g., penetrating

1154 lubricants, cutting tool coolants), the industrial use of laboratory chemicals, the commercial use of  
1155 lubricants and greases (e.g., penetrating lubricants, cutting tool coolants), and the commercial use of  
1156 laboratory chemicals. A full description of EPA's draft determination of unreasonable risk for each  
1157 condition of use is in Section 5.3.

1158  
1159 ***Risk to Occupational Non-Users (ONUs)***

1160 EPA evaluated ONU acute and chronic inhalation exposures for cancer and non-cancer risks and  
1161 determined whether any risks are unreasonable. The drivers for EPA's draft determination of  
1162 unreasonable risks to ONUs are neurotoxicity from acute and chronic inhalation, and cancer resulting  
1163 from chronic inhalation exposure. The draft determinations reflect the effects associated with the  
1164 occupational exposures to PCE and the assumed absence of PPE for ONUs. For dermal exposures,  
1165 because ONUs are not expected to be dermally exposed to PCE, dermal risks to ONUs were not  
1166 evaluated. For inhalation exposures, EPA, where possible, used monitoring or modeling information to  
1167 estimate ONU exposures and to describe the risks separately from workers directly exposed. For some  
1168 conditions of use, EPA did not separately calculate risk estimates for ONUs and workers. For these  
1169 conditions of use, there is uncertainty in the ONU risk estimates since the data or modeling did not  
1170 distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are  
1171 expected to be lower than inhalation exposures for workers directly handling the chemical substance;  
1172 however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for  
1173 this uncertainty, EPA considered the central tendency risk estimate when determining ONU risk for  
1174 those conditions of use for which ONU exposures were not separately estimated. EPA determined that  
1175 most applicable conditions of use do not present unreasonable risks. Estimated numbers of occupational  
1176 non-users are in Section 2.4.1.2.

1177  
1178 ***Risk to Consumers***

1179 EPA evaluated consumer acute inhalation and dermal exposures for non-cancer risks and determined  
1180 whether any risks are unreasonable. The driver for EPA's draft determination of unreasonable risk is  
1181 neurotoxicity from acute inhalation and dermal exposure. Generally, risks for consumers were indicated  
1182 by acute inhalation and dermal exposure at low, medium, and high intensity use.

1183  
1184 For consumers, EPA determined that most consumer conditions of use present unreasonable risks,  
1185 except for use of livestock grooming adhesive, aerosol paints and coatings, and metallic overglaze.

1186  
1187 A full description of EPA's draft determination for each condition of use is in Section 5.3.

1188  
1189 ***Risk to Bystanders (from consumer uses)***

1190 EPA evaluated bystander acute inhalation exposures for non-cancer risks and determined whether any  
1191 risks are unreasonable. The driver for EPA's determination of unreasonable risk are neurotoxicity from  
1192 acute inhalation exposure. Generally, risks for bystanders were indicated by acute inhalation exposure  
1193 scenarios at low, medium, and high intensity use. Because bystanders are not expected to be dermally  
1194 exposed to PCE, dermal non-cancer risks to bystanders were not evaluated. For bystanders, EPA  
1195 determined that most consumer conditions of use present unreasonable risks, except for use of dry  
1196 cleaned articles, arts and crafts adhesive, livestock grooming adhesive, caulks and sealants, aerosol  
1197 coatings and primers, liquid rust primer and sealant, and metallic overglaze.

1198  
1199 A full description of EPA's draft determination for each condition of use is in Section 5.3.

1200  
1201 ***Summary of Risk Determinations***

1202 EPA has preliminarily determined that the following conditions of use of PCE do not present an  
 1203 unreasonable risk of injury under any scenarios. The details of these determinations are presented in  
 1204 Table 5-1 in Section 5.2.  
 1205

**Conditions of Use that Do Not Present an Unreasonable Risk**

- Distribution in commerce
- Industrial use of lubricants and greases (e.g., penetrating lubricants, cutting tool coolants)
- Industrial use of laboratory chemicals
- Commercial use of lubricants and greases (e.g., penetrating lubricants, cutting tool coolants)
- Commercial use of laboratory chemicals
- Consumer use of livestock grooming adhesive
- Consumer use of aerosol coating and primers
- Consumer use of metallic overglaze

1206 EPA has preliminarily determined that the following conditions of use of PCE present an unreasonable  
 1207 risk to the environment or unreasonable risk of injury to health to workers (including, in some cases,  
 1208 occupational non-users) or to consumers (including, in some cases, bystanders). The details of these  
 1209 determinations are presented in Table 5-1 in Section 5.2.  
 1210  
 1211  
 1212

**Manufacturing that Presents an Unreasonable Risk**

- Domestic Manufacture
- Import (includes repackaging and loading/unloading)

1213

**Processing that Presents an Unreasonable Risk**

- Processing as a reactant/intermediate
- Incorporation into formulation, mixture or reaction product (cleaning and degreasing products)
- Incorporation into formulation, mixture or reaction product (adhesive and sealant products)
- Incorporation into formulation, mixture or reaction product (paint and coating products)
- Incorporation into formulation, mixture or reaction product (other chemical products and preparations)
- Repackaging
- Recycling

1214

**Industrial Uses that Present an Unreasonable Risk**

- As a solvent for batch vapor degreasing (open-top)
- As a solvent for batch vapor degreasing (closed-loop)
- As a solvent for in-line vapor degreasing (conveyorized)
- As a solvent for in-line vapor degreasing (web-cleaner)
- As a solvent for cold cleaning
- As a solvent for aerosol spray degreaser/cleaner
- In dry cleaning and spot cleaning (Post-2006 dry cleaning)
- In dry cleaning and spot cleaning (4th/5th Gen only dry cleaning)

- As a lubricants and grease (aerosol lubricants)
- As a solvent-based adhesive and sealant
- As a solvent-based paint and coating
- As a maskant for chemical milling
- As a processing aids for pesticide, fertilizer and other agricultural chemical manufacturing
- As a processing aids specific to petroleum production (catalyst regeneration in petrochemical manufacturing)
- In textile processing (spot cleaning)
- In textile processing (other)
- In wood furniture manufacturing
- As a laboratory chemical
- In foundry applications

1215

#### **Commercial Uses that Present an Unreasonable Risk**

- As a cleaner and degreaser (wipe cleaning)
- As a cleaner and degreaser (other spot cleaning/spot removers (including carpet cleaning))
- As a cleaner and degreaser (mold release)
- In dry cleaning and spot cleaning (Post-2006 dry cleaning)
- In dry cleaning and spot cleaning (4th/5th Gen only dry cleaning)
- In automotive care products (e.g., engine degreaser and brake cleaner)
- As an aerosol cleaner
- As a non-aerosol cleaner
- As a lubricant and grease (aerosol lubricants)
- As a light repair adhesive
- As a solvent-based paint and coating
- In carpet cleaning
- In metal (e.g., stainless steel) and stone polishes
- In inks and ink removal products (printing)
- In inks and ink removal products (photocopying)
- In welding
- In photographic film
- In mold cleaning, release and protectant products

1216

#### **Consumer Uses that Present an Unreasonable Risk**

- As a cleaner and degreaser (other)
- In dry cleaning
- In automotive care products (brake cleaner)
- In automotive care products (parts cleaner)
- In aerosol cleaner (vandalism mark and stain remover, mold cleaner, weld splatter protectant)
- In non-aerosol cleaner (e.g., marble and stone polish)
- In lubricants and greases (cutting fluid)
- In lubricants and greases (lubricants and penetrating Oils)
- In adhesives for arts and crafts (includes industrial adhesive, arts and crafts adhesive, gun ammunition sealant)
- In adhesives for arts and crafts (column adhesive, caulk and sealant)

- In solvent-based paints and coatings (outdoor water shield (liquid))
- In rust primer and sealant (liquid)
- In metal (e.g., stainless steel) and stone polishes
- In inks and ink removal products; welding; mold cleaning, release and protectant products

1217

**Disposal that Presents an Unreasonable Risk**

- Disposal

1218

## 1 INTRODUCTION

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1219

1220 This document presents for comment the draft risk evaluation for PCE under the Frank R. Lautenberg  
1221 Chemical Safety for the 21st Century Act. The Frank R. Lautenberg Chemical Safety for the 21st  
1222 Century Act amended the Toxic Substances Control Act, the Nation’s primary chemicals management  
1223 law in June 2016.

1224 The Agency published the Scope of the Risk Evaluation for PCE in June 2017 ([U.S. EPA 2017j](#)), and  
1225 the problem formulation in June, 2018 ([U.S. EPA 2018d](#)). These which represented the analytical phase  
1226 of risk evaluation in which “the purpose for the assessment is articulated, the problem is defined, and a  
1227 plan for analyzing and characterizing risk is determined” as described in Section 2.2 of the Framework  
1228 for Human health Risk Assessment to Inform Decision Making ([U.S. EPA 2014c](#)). The problem  
1229 formulation identified conditions of use within the scope of the risk evaluation and presented three  
1230 conceptual models and an analysis plan. Based on EPA’s analysis of the conditions of use, physical-  
1231 chemical and fate properties, environmental releases, and exposure pathways, the problem formulation  
1232 preliminarily concluded that further analysis was necessary for exposure pathways to aquatic receptors  
1233 exposed via surface water, workers, and consumers. The conclusions of the problem formulation were  
1234 that risk would not be evaluated for sediment, soil and land-applied biosolid pathways leading to  
1235 exposure to terrestrial and aquatic organisms. Risks would not be evaluated for land-applied biosolids  
1236 because PCE is currently being addressed in the Clean Water Act (CWA) regulatory analytical process.  
1237 EPA also excluded from risk evaluation ambient air, drinking water, land disposal, ambient water, and  
1238 waste incineration pathways leading to exposures to the general population and terrestrial organisms  
1239 since those pathways are regulated under other environmental statutes administered by EPA which  
1240 adequately assess and effectively manage exposures. EPA received comments on the published problem  
1241 formulation for PCE and has considered the comments specific to PCE, as well as more general  
1242 comments regarding EPA’s chemical risk evaluation approach for developing the draft risk evaluations  
1243 for the first 10 chemicals EPA is evaluating.

1244

1245 In this draft risk evaluation, Section 1 presents the basic physical-chemical characteristics of PCE, as  
1246 well as a background on regulatory history, conditions of use, and conceptual models, with particular  
1247 emphasis on any changes since the publication of the problem formulation. This section also includes a  
1248 discussion of the systematic review process utilized in this draft risk evaluation. Section 2 provides a  
1249 discussion and analysis of the exposures, both human health and environmental, that can be expected  
1250 based on the conditions of use for PCE. Section 3 discusses environmental and health hazards of PCE.  
1251 Section 4 presents the risk characterization, where EPA integrates and assesses reasonably available  
1252 information on health and environmental hazards and exposures, as required by TSCA (15 U.S.C.  
1253 2605(b)(4)(F)). This section also includes a discussion of any uncertainties and how they impact the  
1254 draft risk evaluation. Section 5 presents EPA’s proposed determination of whether the chemical presents  
1255 an unreasonable risk under the conditions of use, as required under TSCA (15 U.S.C. 2605(b)(4)).

1256

1257 As per EPA’s final rule, ([U.S. EPA 2017c](#)), this draft risk evaluation will be subject to both public  
1258 comment and peer review, which are distinct but related processes. EPA is providing 60 days for public  
1259 comment on any and all aspects of this draft risk evaluation, including the submission of any additional  
1260 information that might be relevant to the science underlying the risk evaluation and the outcome of the  
1261 systematic review associated with PCE. This satisfies TSCA (15 U.S.C. 2605(b)(4)(H)), which requires  
1262 EPA to provide public notice and an opportunity for comment on a draft risk evaluation prior to  
1263 publishing a final risk evaluation.

1264

1265 Peer review will be conducted in accordance with EPA's regulatory procedures for chemical risk  
1266 evaluations, including using the EPA Peer Review Handbook ([U.S. EPA 2015a](#)) and other methods  
1267 consistent with section 26 of TSCA (*See* 40 CFR 702.45). As explained in the Risk Evaluation Rule  
1268 ([U.S. EPA 2017c](#)), the purpose of peer review is for the independent review of the science underlying  
1269 the risk assessment. Peer review will therefore address aspects of the underlying science as outlined in  
1270 the charge to the peer review panel such as hazard assessment, assessment of dose-response, exposure  
1271 assessment, and risk characterization.

1272 As EPA explained in the Risk Evaluation Rule ([U.S. EPA 2017c](#)), it is important for peer reviewers to  
1273 consider how the underlying risk evaluation analyses fit together to produce an integrated risk  
1274 characterization, which forms the basis of an unreasonable risk determination. EPA believes peer  
1275 reviewers will be most effective in this role if they receive the benefit of public comments on draft risk  
1276 evaluations prior to peer review. The final risk evaluation may change in response to public comments  
1277 received on the draft risk evaluation and/or in response to peer review, which itself may be informed by  
1278 public comments. EPA will respond to public and peer review comments received on the draft risk  
1279 evaluation and will explain changes made to the draft risk evaluation for PCE in response to those  
1280 comments in the final risk evaluation.

1281 EPA solicited input on the first 10 chemicals as it developed use documents, scope documents, and  
1282 problem formulations. At each step, EPA has received information and comments specific to individual  
1283 chemicals and of a more general nature relating to various aspects of the risk evaluation process,  
1284 technical issues, and the regulatory and statutory requirements. EPA has considered comments and  
1285 information received at each step in the process and factored in the information and comments as the  
1286 Agency deemed appropriate and relevant including comments on the published problem formulation of  
1287 PCE. Thus, in addition to any new comments on the draft risk evaluation, the public should re-submit or  
1288 clearly identify at this point any previously filed comments, modified as appropriate, that are relevant to  
1289 this risk evaluation and that the submitter feels have not been addressed. EPA does not intend to further  
1290 respond to comments submitted prior to the publication of this draft risk evaluation unless they are  
1291 clearly identified in comments on this draft risk evaluation.

## 1292 **1.1 Physical and Chemical Properties**

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1293 Physical-chemical properties influence the environmental behavior and the toxic properties of a  
1294 chemical, thereby informing the potential conditions of use, exposure pathways and routes and hazards  
1295 that EPA intends to consider. For scope development, EPA considered the measured or estimated  
1296 physical-chemical properties set forth in Table 1-1; EPA found no additional information during  
1297 problem formulation or risk evaluation that would change these values.

1298

**Table 1-1 Physical and Chemical Properties of PCE**

Property	Value <sup>a</sup>	References	Data Quality Rating
Molecular formula	C <sub>2</sub> Cl <sub>4</sub>		
Molecular weight	165.833		
Physical form	Colorless liquid; chloroform-like odor	<a href="#">Lewis (2007)</a> ; <a href="#">NIOSH (2005)</a> ; <a href="#">U.S. Coast Guard (1984)</a>	High
Melting point	-22.3°C	<a href="#">Lide (2007)</a>	High
Boiling point	121.3°C	<a href="#">Lide (2007)</a>	High
Density	1.623 g/cm <sup>3</sup> at 20°C	<a href="#">Lide (2007)</a>	High
Vapor pressure	18.5 mmHg at 25°C	<a href="#">Riddick et al. (1985)</a>	High
Vapor density	5.83 (relative to air)	<a href="#">(Lewis 1992)</a>	High
Water solubility	206 mg/L at 20°C	<a href="#">Horvath (1982)</a>	High
Octanol:water partition coefficient (K <sub>ow</sub> )	3.40	<a href="#">Hansch et al. (1995)</a>	High
Henry's Law constant	0.0177 atm·m <sup>3</sup> /mole	<a href="#">Gossett (1987)</a>	High
Flash point	Not applicable	<a href="#">Nfpa (2010)</a>	High
Autoflammability	Not readily available		
Viscosity	0.839 cP at 25°C	<a href="#">Hickman (2000)</a>	High
Refractive index	1.4775	<a href="#">Lide (2007)</a>	High
Dielectric constant	2.30 at 25°C	<a href="#">(Lange and Dean 1985)</a>	High

<sup>a</sup> Measured unless otherwise noted.

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1300

## 1.2 Uses and Production Volume

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The uses of PCE include the production of fluorinated compounds, dry cleaning and vapor degreasing, as well as a number of less produced uses. Nearly 65% of the production volume of PCE is used as an intermediate in industrial gas manufacturing, more specifically to produce fluorinated compounds, such as hydrofluorocarbons (HFCs) and hydrochlorofluorocarbons (HCFCs) ([NTP 2014](#)) ([Icis 2011](#)). HFCs 134a and 125 are alternatives to chlorofluorocarbons (CFCs) and HCFCs, which are ozone depleting substances (ODSs), and the subject of a phase-out (<https://www.epa.gov/ods-phaseout>). HCFCs are transitional substances in the phase-out of ODSs ([Icis 2011](#)), ([Fay 2017](#)). Previously, PCE was widely used to manufacture CFCs (especially trichlorotrifluoroethane (CFC-113)) until production and importation of CFCs for most uses were phased out in the United States by regulations implementing the Montreal Protocol (40 CFR part 82). A relatively small amount of CFC-113 is still produced for exempted uses ([van Hook 2017](#)).



1312 The second largest use of PCE (~15%) is as a solvent in dry cleaning facilities ([NTP 2014](#)). PCE is non-  
1313 flammable and effectively dissolves fats, greases, waxes and oils, without harming natural or human-  
1314 made fibers. These properties enabled it to replace traditional petroleum solvents ([ATSDR 2014](#); [Dow  
1315 Chemical Co 2008](#); [Tirrell 2000](#)). The demand for PCE dry cleaning solvents has steadily declined as a  
1316 result of the improved efficiency of dry cleaning equipment, increased chemical recycling and the  
1317 popularity of wash-and-wear fabrics that eliminate the need for dry cleaning ([ATSDR 2019](#)). PCE is  
1318 also used in dry cleaning detergent and dry cleaning sizing.

1319 Approximately 60% of dry cleaning machines now use PCE as a solvent ([DLI/NCA 2017](#)). In 1991,  
1320 EPA estimated that 83% of all dry cleaning facilities used PCE as solvent ([U.S. EPA 1991](#)). In 2008, the  
1321 Halogenated Solvents Industry Association (HSIA) estimated that 70% of dry cleaners used PCE as dry  
1322 cleaning solvent ([Graul 2017](#)). Similarly, in 2011, King County, WA conducted a profile of the dry  
1323 cleaning industry and found that 69% of respondents (105 of the 152 respondents) used PCE in their  
1324 primary machine ([Whittaker and Johanson 2011](#)). Hence, there appears to be a trend towards alternatives  
1325 to PCE in dry cleaning. According to the dry cleaning industry, a majority of new PCE dry cleaning  
1326 machines are sold in locations where “local fire codes preclude the use of Class III combustible  
1327 alternative solvents or [where] the nature of the operation demands the use of PCE” ([DLI/NCA 2017](#)).

1328 The third most prevalent use of PCE (~10%) is as a vapor degreasing solvent ([NTP 2014](#)). PCE can be  
1329 used to dissolve many organic compounds, select inorganic compounds and high-melting pitches and  
1330 waxes making it ideal for cleaning contaminated metal parts and other fabricated materials ([ATSDR  
1331 2019](#)). It is a very good solvent for greases, fats, waxes, oils, bitumen, tar and many natural and  
1332 synthetic resins for use in chemical cleaning systems, degreasing light and heavy metals, degreasing  
1333 pelts and leather (tanning), extraction of animal and vegetable fats and oils and textile dyeing (solvent  
1334 for dye baths) ([Stoye 2000](#)). PCE is also used in cold cleaning, which is similar to vapor degreasing,  
1335 except that cold cleaning does not require the solvent to be heated to its boiling point in order to clean a  
1336 given component. Vapor degreasing and cold cleaning scenarios may include a range of open-top or  
1337 closed systems, conveyORIZED/enclosed/inline systems, spray wands, dip containers and wipes.

1338 PCE has many other uses, which collectively constitute ~10% of the production volume. EPA’s search  
1339 of safety data sheets, government databases and other sources found over 375 products containing PCE.  
1340 These uses include (but are not limited to):

- 1341 • Adhesives
- 1342 • Aerosol degreasing
- 1343 • Brake cleaner
- 1344 • Laboratories
- 1345 • Lubricants
- 1346 • Mold cleaners, releases and protectants
- 1347 • Oil refining
- 1348 • Sealants
- 1349 • Stainless steel polish
- 1350 • Tire buffers and cleaners
- 1351 • Vandal mark removers

1352 Many of these uses include consumer products, such as adhesives (arts and crafts, as well as light  
1353 repairs), aerosol degreasing, brake cleaners, aerosol lubricants, sealants, sealants for gun ammunition,  
1354 stone polish, stainless steel polish and wipe cleaners. The uses of PCE in consumer adhesives and brake  
1355 cleaners are especially prevalent; EPA has found 16 consumer adhesive products and 14 consumer brake  
1356 cleaners containing PCE (see [U.S. EPA 2017g](#)).

1357 The Chemical Data Reporting (CDR) Rule under TSCA requires U.S. manufacturers and importers to  
 1358 provide EPA with information on the chemicals they manufacture or import into the United States. For  
 1359 the 2016 CDR cycle, data collected per chemical include the company name, volume of each chemical  
 1360 manufactured/imported, the number of workers at each site, and information on whether the chemical is  
 1361 used in the Commercial, Industrial, and/or consumer sector. However, only companies that  
 1362 manufactured or imported 25,000 pounds or more at each of their sites during the 2015 calendar year  
 1363 were required to report information under the CDR rule ([U.S. EPA 2016d](#)).

1364 The 2016 CDR reporting data for PCE are provided in Table 1-2 from EPA’s CDR database ([U.S. EPA  
 1365 2016c](#)). This information has not changed from that provided in the scope document.

1366 **Table 1-2 Production Volume of PCE in CDR Reporting Period (2012 to 2015) <sup>a</sup>**

Reporting Year	2012	2013	2014	2015
Total Aggregate Production Volume (lbs)	387,623,401	391,403,540	355,305,850	324,240,744

<sup>a</sup>The CDR data for the 2016 reporting period is available via ChemView (<https://java.epa.gov/chemview>) ([ChemView 2019](#)). The CDR data presented in the problem formulation is more specific than currently available in ChemView.

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### 1369 **1.3 Regulatory and Assessment History**

1370 EPA conducted a search of existing domestic and international laws, regulations and assessments  
 1371 pertaining to PCE. EPA compiled this summary from data available from federal, state, international and  
 1372 other government sources, as cited in Appendix A.

#### 1373 **Federal Laws and Regulations**

1374 PCE is subject to federal statutes or regulations, other than TSCA, that are implemented by other offices  
 1375 within EPA and/or other federal agencies/departments. A summary of federal laws, regulations and  
 1376 implementing authorities is provided in Appendix A.

#### 1377 **State Laws and Regulations**

1378 PCE is subject to state statutes or regulations implemented by state agencies or departments. A summary  
 1379 of state laws, regulations and implementing authorities is provided in Appendix A.

#### 1380 **Laws and Regulations in Other Countries and International Treaties or Agreements**

1381 PCE is subject to statutes or regulations in countries other than the United States. A summary of these  
 1382 laws and regulations is provided in Appendix A.

#### 1383 **Assessment History**

1384 EPA identified assessments conducted by other EPA Programs and other organizations (see Table 1-3).  
 1385 Depending on the source, these assessments may include information on conditions of use, hazards,  
 1386 exposures and potentially exposed or susceptible subpopulations. EPA found no additional assessments  
 1387 beyond those listed in the Problem Formulation document.

1388 **Table 1-3 Assessment History of PCE**

Authoring Organization	Assessment
EPA Assessments	

Authoring Organization	Assessment
Integrated Risk Information System (IRIS)	Toxicological Review of Tetrachloroethylene (Perchloroethylene) (CAS No. 127-18-4) ( <a href="#">U.S. EPA 2012e</a> )
Office of Air Quality Planning and Standards (OAQPS)	Perchloroethylene Dry Cleaners Refined Human Health Risk Characterization ( <a href="#">U.S. EPA 2005b</a> )
National Center for Environmental Assessment (NCEA)	Sources, Emission and Exposure for Trichloroethylene (TCE) and Related Chemicals ( <a href="#">U.S. EPA 2001</a> )
Office of Air Toxics	Tetrachloroethylene (PCE, Perchloroethylene); 127-18-4 ( <a href="#">U.S. EPA 2000</a> )
Office of Pesticides and Toxic Substances (now, Office of Chemical Safety and Pollution Prevention [OCSPP])	Occupational Exposure and Environmental Release Assessment of Tetrachloroethylene ( <a href="#">U.S. EPA 1985b</a> )
Office of Health and Environmental Assessment	Final Health Effects Criteria Document for Tetrachloroethylene ( <a href="#">U.S. EPA 1985a</a> )
Office of Water (OW)	Update of Human Health Ambient Water Quality Criteria: Tetrachloroethylene (Perchloroethylene) 127-18-4 ( <a href="#">U.S. EPA 2015b</a> )
Office of Water (OW)	Ambient Water Quality Criteria for Tetrachloroethylene ( <a href="#">U.S. EPA 1980</a> )
<b>Other U.S.-Based Organizations</b>	
California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA), Air Toxics Hot Spots Program	Perchloroethylene Inhalation Cancer Unit Risk Factor ( <a href="#">OEHHA 2016</a> )
Agency for Toxic Substances and Disease Registry (ATSDR)	Toxicological Profile for Tetrachloroethylene (PERC) ( <a href="#">ATSDR 2019</a> )
National Advisory Committee for Acute Exposure Guideline Levels for Hazardous Substances (NAC/AEGL Committee)	Tetrachloroethylene ( <a href="#">NAC/AEGL 2009</a> )
California Environmental Protection Agency, OEHHA, Pesticide and Environmental Toxicology Section	Public Health Goal for Tetrachloroethylene in Drinking Water ( <a href="#">OEHHA 2001</a> )
National Toxicology Program (NTP)	Toxicology and Carcinogenesis Studies of Tetrachloroethylene (Perchloroethylene); (CAS No. 127-18-4) in F344/N Rats and B6C3F1 Mice ( <a href="#">NTP 1986a</a> )
<b>International</b>	

Authoring Organization	Assessment
International Agency for Research on Cancer (IARC)	IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Tetrachloroethylene ( <a href="#">IARC 2014</a> )
European Union (EU), Scientific Committee on Health and Environmental Risks (SCHER)	SCHER, Scientific Opinion on the Risk Assessment Report on Tetrachloroethylene, Human Health Part, CAS No.: 127-18-4, 12 ( <a href="#">Scher 2008</a> )
World Health Organization (WHO)	Concise International Chemical Assessment Document 68; Tetrachloroethylene ( <a href="#">WHO 2006a</a> )
EU, European Chemicals Bureau (ECB)	EU Risk Assessment Report; Tetrachloroethylene, Part 1 - environment ( <a href="#">ECB 2005</a> )
National Industrial Chemicals Notification and Assessment Scheme (NICNAS), Australia	Tetrachloroethylene; Priority Existing Chemical Assessment Report No. 15 ( <a href="#">NICNAS 2001</a> )

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## 1.4 Scope of the Evaluation

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### 1.4.1 Conditions of Use Included in the Risk Evaluation

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TSCA § 3(4) defines the Conditions of Use (COUs) as “the circumstances, as determined by the Administrator, under which a chemical substance is intended, known, or reasonably foreseen to be manufactured, processed, distributed in commerce, used, or disposed of.” The conditions of use are described below in Table 1-4. No additional information was received by EPA following the publication of the problem formulation that would update or otherwise require changes to the use document conditions of use ([U.S. EPA 2018d](#)) Table 2-4) or the life cycle diagram as presented in the problem formulation ([U.S. EPA 2018d](#)). The life cycle diagram is presented in Figure 1-1.

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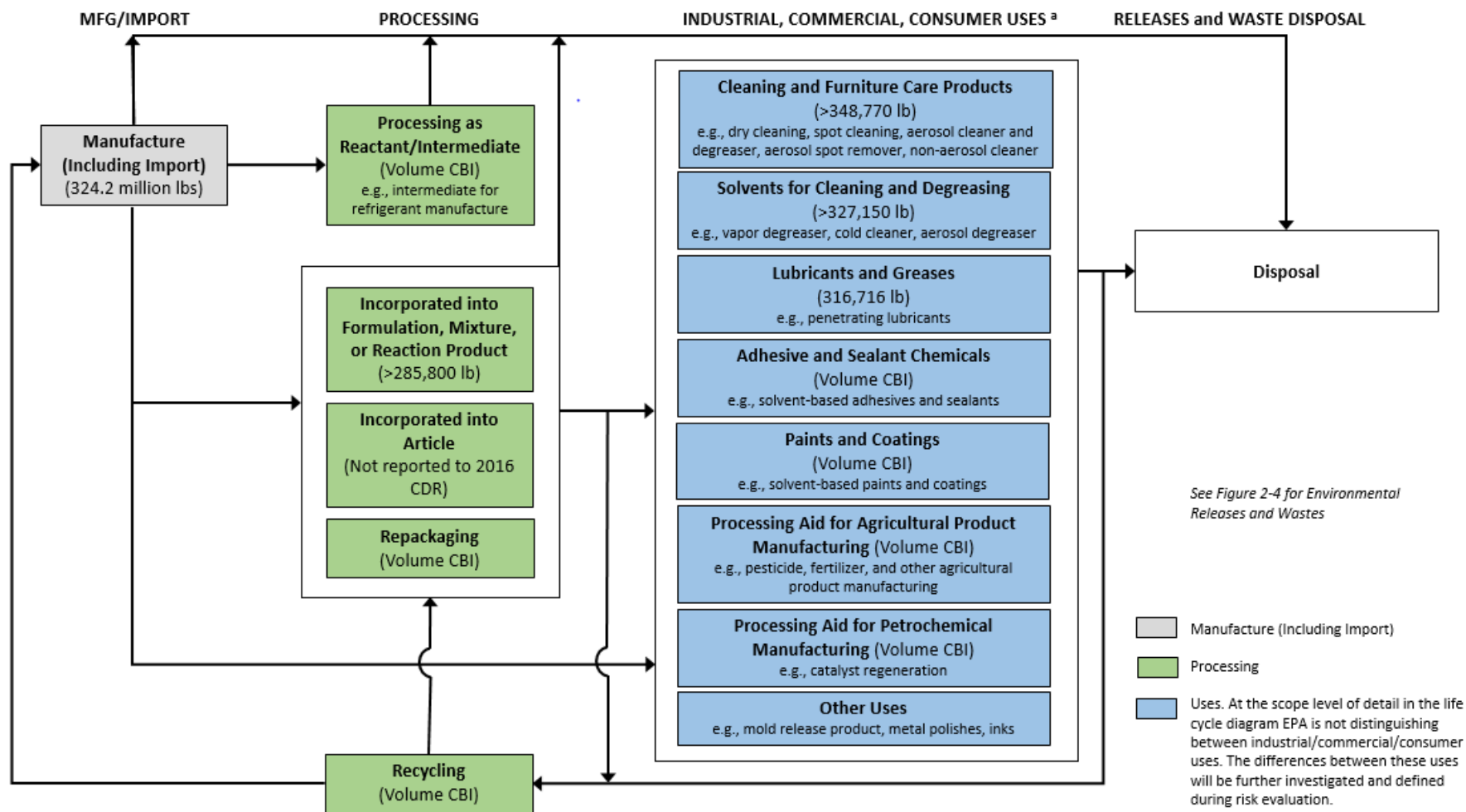
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1402 **Figure 1-1. PCE Life Cycle Diagram**

1403 The life cycle diagram depicts the conditions of use that are within the scope of the risk evaluation during various life cycle stages including  
 1404 manufacturing, processing, use (industrial or commercial) and disposal. The production volumes shown are for reporting year 2015 from the  
 1405 2016 CDR reporting period (Table 1-2) ([U.S. EPA 2016c](#)). Activities related to distribution (e.g., loading, unloading) will be considered  
 1406 throughout the PCE life cycle, rather than using a single distribution scenario.

1407 <sup>a</sup> See Table 1-4 for additional uses not mentioned specifically in this diagram.

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1409  
1410**Table 1-4 Categories and Subcategories of Conditions of Use Included in the Scope of the Risk Evaluation**

Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	References	
Manufacture	Domestic manufacture	Domestic manufacture	<a href="#">(U.S. EPA 2016c)</a>	
	Import	Import	<a href="#">(U.S. EPA 2016c)</a>	
Processing	Processing as a reactant or intermediate	Intermediate in industrial gas manufacturing	<a href="#">(U.S. EPA 2016c)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Krock 2017a)</a> ; <a href="#">(Krock 2017b)</a> ; <a href="#">(Cooper 2017)</a> ; <a href="#">(Fay 2017)</a>	
		Intermediate in basic organic chemical manufacturing	<a href="#">(U.S. EPA 2016b)</a> , <a href="#">(U.S. EPA 2017g)</a> ;	
		Intermediate in petroleum refineries	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Cooper 2017)</a>	
		Residual or byproduct	<a href="#">(Krock 2017a)</a> ; <a href="#">(Krock 2017b)</a> ;	
	Incorporated into formulation, mixture or reaction product	Cleaning and degreasing products	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(Rudnick 2017a)</a> , <a href="#">(Rudnick 2017b)</a>	
		Adhesive and sealant products	<a href="#">(U.S. EPA 2016b)</a>	
		Paint and coating products	<a href="#">(U.S. EPA 2016b)</a>	
		Other chemical products and preparations	<a href="#">(U.S. EPA 2016b)</a>	
	Repackaging	Solvent for cleaning or degreasing	<a href="#">(U.S. EPA 2016b)</a>	
		Intermediate	<a href="#">(U.S. EPA 2016b)</a>	
	Recycling	Recycling	<a href="#">(U.S. EPA 2016b)</a>	
	Distribution in commerce	Distribution	Distribution	<a href="#">(U.S. EPA 2017g)</a>
	Industrial use	Solvents (for cleaning or degreasing)	Solvents and/or Degreasers (cold, aerosol spray or vapor degreaser; not specified in comment)	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Holmes 2017)</a> ; <a href="#">(Tatman 2017)</a>
Batch vapor degreaser (e.g., open-top, closed-loop)			<a href="#">(U.S. EPA 1985b)</a> ; <a href="#">(Riegle 2017)</a> ; <a href="#">(HSIA 2018b)</a>	
In-line vapor degreaser (e.g., conveyORIZED, web cleaner)			<a href="#">(U.S. EPA 1985b)</a> ; <a href="#">(Dowell 2017)</a>	
Solvents (for cleaning or degreasing)		Cold cleaner	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Rudnick 2017a)</a> , <a href="#">(Rudnick 2017b)</a>	
		Aerosol spray degreaser/cleaner	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a> ; <a href="#">(Rudnick 2017a)</a> , <a href="#">(Rudnick 2017b)</a>	

PEER REVIEW DRAFT. DO NOT CITE OR QUOTE

Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	References
		Dry cleaning solvent	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(U.S. EPA 2006a)</a>
		Spot cleaner	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a>
	Lubricants and greases	Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(HSIA 2018b)</a> ; <a href="#">(Tatman 2017)</a> ; <a href="#">(HSIA 2018b)</a> ; <a href="#">(Tatman 2017)</a>
	Adhesive and sealant chemicals	Solvent-based adhesives and sealants	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a> ; <a href="#">(Riegler 2017)</a> ; <a href="#">(Holmes 2017)</a> ; <a href="#">(HSIA 2018b)</a>
	Paints and coatings including paint and coating removers	Solvent-based paints and coatings, including for chemical milling	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a> ; <a href="#">(Riegler 2017)</a> ; <a href="#">(Davis 2017)</a> ; <a href="#">(HSIA 2018b)</a> ; <a href="#">(U.S. DOD 2017)</a>
	Processing aids, not otherwise listed	Pesticide, fertilizer and other agricultural chemical manufacturing	<a href="#">(U.S. EPA 2016b)</a>
	Processing aids, specific to petroleum production	Catalyst regeneration in petrochemical manufacturing	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Dow Chem 2008)</a> ; <a href="#">(Cooper 2017)</a> ; <a href="#">(HSIA 2018b)</a>
	Other uses	Textile processing	<a href="#">(U.S. EPA 2017g)</a>
		Wood furniture manufacturing	<a href="#">(U.S. EPA 2017g)</a>
		Laboratory chemicals	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Riegler 2017)</a>
Foundry applications		<a href="#">(U.S. EPA 2017g)</a>	
Commercial/consumer use	Cleaning and furniture care products	Cleaners and degreasers (other)	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a> ; <a href="#">(Rudnick 2017a)</a> , <a href="#">(Rudnick 2017b)</a> ; <a href="#">(Holmes 2017)</a> ; <a href="#">(McCormick 2017)</a> ; <a href="#">(HSIA 2018b)</a> ; <a href="#">(Tatman 2017)</a>
		Dry cleaning solvent	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(U.S. EPA 2006a)</a> ; <a href="#">(DLI/NCA 2017)</a> ; <a href="#">(Sass 2017)</a>

PEER REVIEW DRAFT. DO NOT CITE OR QUOTE

Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	References	
		Spot cleaner	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(U.S. EPA 2006a)</a> ; <a href="#">(Sass 2017)</a>	
		Automotive care products (e.g., engine degreaser and brake cleaner)	<a href="#">U.S. EPA (2016d)</a> , <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Rudnick 2017a)</a> , <a href="#">(Rudnick 2017b)</a> ; <a href="#">(HSIA 2018b)</a>	
		Aerosol cleaner	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a>	
		Non-aerosol cleaner	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a>	
	Lubricants and greases	Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(HSIA 2018b)</a> ; <a href="#">(Tatman 2017)</a>	
	Adhesives and sealant chemicals	Adhesives for arts and crafts	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a>	
		Light repair adhesives	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(U.S. EPA 2017g)</a>	
	Paints and coatings	Solvent-based paints and coatings	<a href="#">(U.S. EPA 2016b)</a> ; <a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a> ; <a href="#">(Davis 2017)</a> ; <a href="#">(HSIA 2018b)</a>	
	Other uses	Carpet cleaning	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Sass 2017)</a>	
		Laboratory chemicals	<a href="#">(U.S. EPA 2017g)</a>	
		Metal (e.g., stainless steel) and stone polishes	<a href="#">(U.S. EPA 2017g)</a>	
		Inks and ink removal products	<a href="#">(U.S. EPA 2017g)</a>	
		Welding	<a href="#">(U.S. EPA 2017g)</a>	
		Photographic film	<a href="#">(U.S. EPA 2017g)</a>	
		Mold cleaning, release and protectant products	<a href="#">(U.S. EPA 2017g)</a> ; <a href="#">(Rudnick 2017a)</a> , <a href="#">(Rudnick 2017b)</a>	
	Disposal	Disposal	Industrial pre-treatment	<a href="#">(U.S. EPA 2017g)</a>
			Industrial wastewater treatment	
Publicly owned treatment works (POTW)				
Underground injection				
Municipal landfill				
Hazardous landfill				
Other land disposal				



Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	References
		Municipal waste incinerator	
		Hazardous waste incinerator	
		Off-site waste transfer	
		Off-site waste transfer	
<sup>a</sup> These categories of conditions of use appear in the life cycle diagram, reflect CDR codes and broadly represent conditions of use for PCE in consumer, industrial, and/or commercial settings. <sup>b</sup> These subcategories reflect more specific uses of PCE.			

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1412 **1.4.2 Conceptual Models**

1413 The conceptual models for this risk evaluation are shown in Figure 1-2, Figure 1-3, and Figure 1-4. EPA  
 1414 considered the potential for hazards to human health and the environment resulting from exposure  
 1415 pathways outlined in the preliminary conceptual models of the PCE scope document ([U.S. EPA 2017j](#)).  
 1416 These conceptual models considered potential exposures resulting from industrial and commercial  
 1417 activities, consumer activities and uses and environmental releases and wastes. The problem formulation  
 1418 documents refined the initial conceptual models and analysis plans that were provided in the PCE scope  
 1419 document ([U.S. EPA 2018d](#)).

1420

1421 For the purpose of this evaluation, EPA considered workers and occupational non-users, which includes  
 1422 men and women of reproductive age (Figure 1-2). Consumer exposure was assessed for various  
 1423 pathways for users age 11 and older along with bystanders of all ages (Figure 1-3).

1424

1425 The potential pathways that were determined to be included in the risk evaluation but not to warrant  
 1426 further analysis in this draft risk evaluation were: exposure to both humans and ecological organisms  
 1427 due to land application of biosolids following wastewater treatment leading to exposure terrestrial  
 1428 organisms. In the problem formulation, EPA determined that risks would not be evaluated for land-  
 1429 applied biosolids because PCE is currently being addressed in the Clean Water Act (CWA) regulatory  
 1430 analytical process. Also, as outlined in Section 1.3 and Appendix A, PCE is regulated in various  
 1431 environmental media.

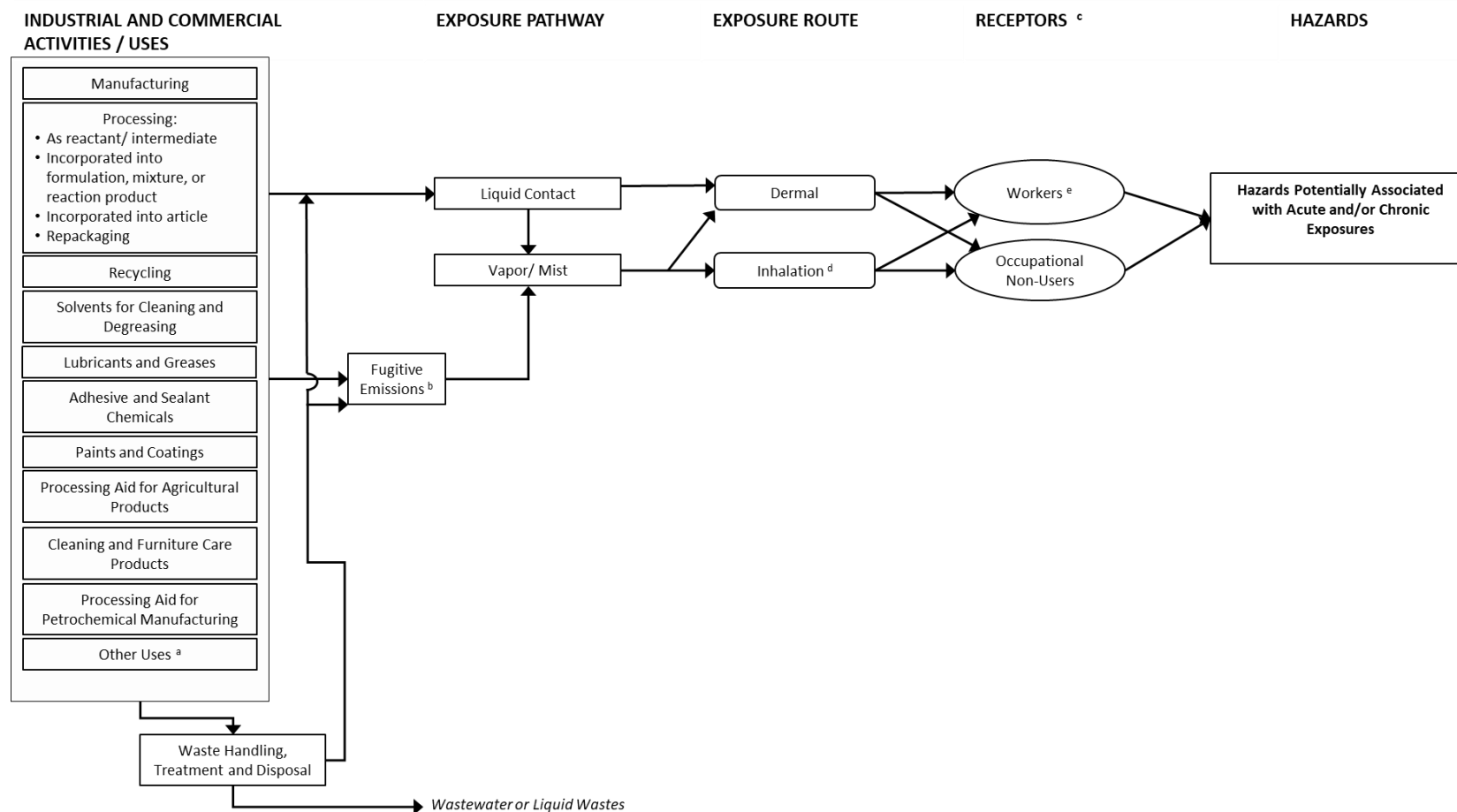
1432

1433 The potential pathways that were determined to be included in the risk evaluation and further analyzed  
 1434 include:

- 1435 • Exposure to aquatic species (e.g. aquatic plants) via contaminated surface water.
- 1436 • Inhalation and dermal exposures to workers and consumer users, and inhalation exposures to  
 1437 ONUs and consumer bystanders, from industrial/commercial activities and consumer activities.
- 1438 • Inhalation and dermal exposures to workers and inhalation exposures to ONUs from waste  
 1439 handling, treatment and disposal.

1440

1441 Review and evaluation of reasonably available information on PCE confirmed the preliminary  
 1442 conclusions in the problem formulation and as a result, the EPA confirms further analysis of the  
 1443 pathways outlined in the conceptual models. The conceptual models for this risk evaluation are shown in  
 1444 Figure 1-2, Figure 1-3, and Figure 1-4.



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**Figure 1-2. PCE Conceptual Model for Industrial and Commercial Activities and Uses: Potential Exposures and Hazards**

The conceptual model presents the exposure pathways, exposure routes and hazards to human receptors from industrial and commercial activities and uses of PCE.

<sup>a</sup> Some products are used in both commercial and consumer applications such as adhesives and sealants. Additional uses of PCE are included in Table 1-4.

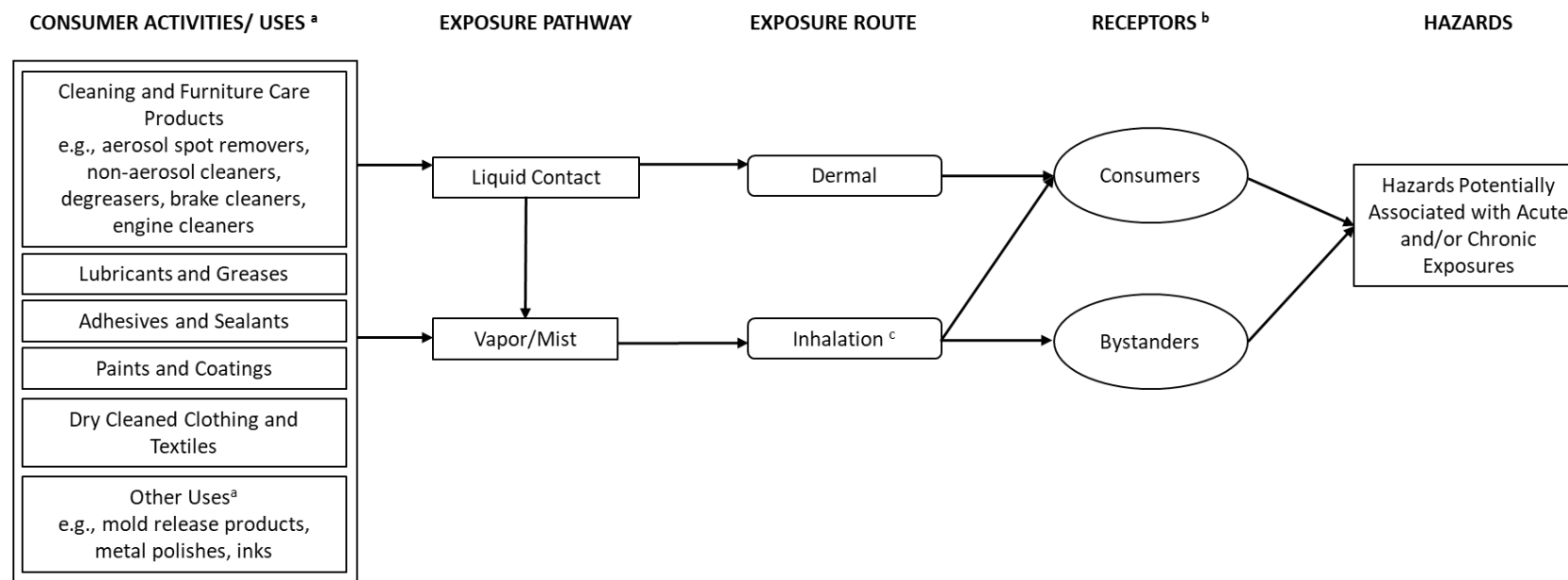
<sup>b</sup> Fugitive air emissions are those that are not stack emissions and include fugitive equipment leaks from valves, pump seals, flanges, compressors, sampling connections and open-ended lines; evaporative losses from surface impoundment and spills; and releases from building ventilation systems.

<sup>c</sup> Receptors include potentially exposed or susceptible subpopulations.

<sup>d</sup> Oral exposure may occur through mists that deposit in the upper respiratory tract however, based on physical chemical properties, mists of PCE will likely be rapidly absorbed in the respiratory tract or evaporate and will be considered as an inhalation exposure.

<sup>e</sup> When data and information are available to support the analysis, EPA also considers the effect that engineering controls and/or personal protective equipment have on occupational exposure levels

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**Figure 1-3. PCE Conceptual Model for Consumer Activities and Uses: Potential Exposures and Hazards**

1461

The conceptual model presents the exposure pathways, exposure routes and hazards to human receptors from consumer activities and uses of PCE.

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<sup>a</sup> Some products are used in both commercial and consumer applications. Additional uses of PCE are included in Table 1-2.

1464

<sup>b</sup> Receptors include potentially exposed or susceptible subpopulations.

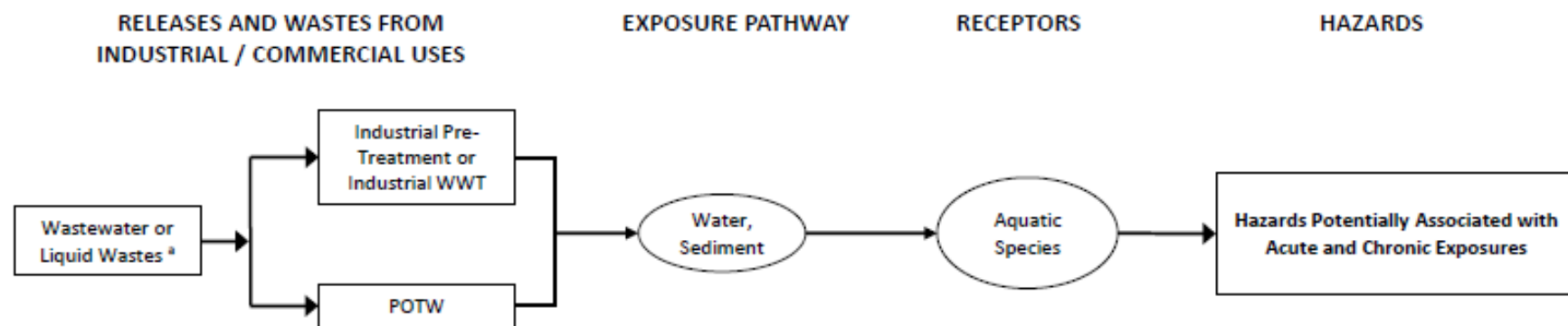
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<sup>c</sup> Consumers oral exposure may occur through mists that deposit in the upper respiratory tract however, based on physical chemical properties, mists of PCE will likely be rapidly absorbed in the respiratory tract or evaporate and will be considered as an inhalation exposure.

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**Figure 1-4. PCE Conceptual Model for Environmental Releases and Wastes: Potential Ecological Exposures and Hazards**

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The conceptual model presents the exposure pathways, exposure routes and hazards to human and environmental receptors from environmental releases and wastes of PCE.

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<sup>a</sup> Industrial wastewater or liquid wastes may be treated on-site and then released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge).

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## 1478 **1.5 Systematic Review**

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1479 TSCA requires EPA to use scientific information, technical procedures, measures, methods,  
1480 protocols, methodologies and models consistent with the best available science and base  
1481 decisions under section 6 on the weight of scientific evidence. Within the TSCA risk evaluation  
1482 context, the weight of the scientific evidence is defined as “*a systematic review method, applied*  
1483 *in a manner suited to the nature of the evidence or decision, that uses a pre-established protocol*  
1484 *to comprehensively, objectively, transparently, and consistently identify and evaluate each*  
1485 *stream of evidence, including strengths, limitations, and relevance of each study and to integrate*  
1486 *evidence as necessary and appropriate based upon strengths, limitations, and relevance*” (40  
1487 CFR 702.33).

1488  
1489 To meet the TSCA § 26(h) science standards, EPA used the TSCA systematic review process  
1490 described in the *Application of Systematic Review in TSCA Risk Evaluations* document ([U.S.](#)  
1491 [EPA 2018c](#)). The process complements the risk evaluation process in that the data collection,  
1492 data evaluation and data integration stages of the systematic review process are used to develop  
1493 the exposure and hazard assessments based on reasonably available information. EPA defines  
1494 “reasonably available information” to mean information that EPA possesses, or can reasonably  
1495 obtain and synthesize for use in risk evaluations, considering the deadlines for completing the  
1496 evaluation (40 CFR 702.33).

1497  
1498 EPA is implementing systematic review methods and approaches within the regulatory context  
1499 of the amended TSCA. Although EPA will make an effort to adopt as many best practices as  
1500 practicable from the systematic review community, EPA expects modifications to the process to  
1501 ensure that the identification, screening, evaluation and integration of data and information can  
1502 support timely regulatory decision making under the timelines of the statute.  
1503

### 1504 **1.5.1 Data and Information Collection**

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1505 EPA planned and conducted a comprehensive literature search based on key words related to the  
1506 different discipline-specific evidence supporting the risk evaluation (e.g., environmental fate and  
1507 transport; environmental releases and occupational exposure; exposure to general population,  
1508 consumers and environmental exposure; and environmental and human health hazard). EPA then  
1509 developed and applied inclusion and exclusion criteria during the title/abstract screening to  
1510 identify information potentially relevant for the risk evaluation process. The literature and  
1511 screening strategy as specifically applied to PCE is described in *Strategy for Conducting*  
1512 *Literature Searches for Perchloroethylene (PCE) Supplemental File to the TSCA Scope*  
1513 *Document* ([U.S. EPA 2017j](#)) and the results of the title and abstract screening process were  
1514 published in *PCE (CASRN 127-18-4) Bibliography: Supplemental File for the TSCA Scope*  
1515 *Document*; ([U.S. EPA 2017e](#)).

1516  
1517 For studies determined to be on-topic (or relevant) after title and abstract screening, EPA  
1518 conducted a full text screening to further exclude references that were not relevant to the risk  
1519 evaluation. Screening decisions were made based on eligibility criteria documented in the form  
1520 of the populations, exposures, comparators, and outcomes (PECO) framework or a modified

1521 framework<sup>2</sup>. Data sources that met the criteria were carried forward to the data evaluation stage.  
1522 The inclusion and exclusion criteria for full text screening for PCE are available in in Appendix  
1523 F of the *Problem Formulation of the Risk Evaluation for PCE* ([U.S. EPA 2018d](#)).

1524  
1525 Although EPA conducted a comprehensive search and screening process as described above,  
1526 EPA made the decision to leverage the literature published in previous assessments<sup>3</sup> to identify  
1527 key and supporting data<sup>4</sup> and information for developing the PCE risk evaluation. This is  
1528 discussed *Strategy for Conducting Literature Searches for Perchloroethylene (PCE)*  
1529 *Supplemental File to the TSCA Scope Document* ([U.S. EPA 2017j](#)). In general, many of the key  
1530 and supporting data sources were identified in the comprehensive *Perchloroethylene (CASRN*  
1531 *127-18-4) Bibliography: Supplemental File for the TSCA Scope Document*; ([U.S. EPA 2017e](#)).  
1532 However, there was an instance during the releases and occupational exposure data search for  
1533 which EPA missed relevant references that were not captured in the initial categorization of the  
1534 on-topic references. EPA found additional relevant data and information using backward  
1535 reference searching, which was a technique that will be included in future search strategies. This  
1536 issue was discussed in Section 4 of *Application of Systematic Review for TSCA Risk Evaluations*  
1537 ([U.S. EPA 2018c](#)). Other relevant key and supporting references were identified through targeted  
1538 supplemental searches to support the analytical approaches and methods in the PCE risk  
1539 evaluation (e.g., to locate specific information for exposure modeling).

1540  
1541 EPA used previous chemical assessments to quickly identify relevant key and supporting  
1542 information as a pragmatic approach to expedite the quality evaluation of the data sources, but  
1543 many of those data sources were already captured in the comprehensive literature as explained  
1544 above. EPA also considered newer information not taken into account by previous chemical  
1545 assessments as described in *Strategy for Conducting Literature Searches for Perchloroethylene*  
1546 *(PCE) Supplemental File to the TSCA Scope Document* ([U.S. EPA 2017j](#)). EPA then evaluated  
1547 the confidence of the key and supporting data sources as well as newer information instead of  
1548 evaluating the confidence of all the underlying evidence ever published on a chemical  
1549 substance's fate and transport, environmental releases, environmental and human exposure and  
1550 hazards. Such comprehensive evaluation of all of the data and information ever published for a  
1551 chemical substance would be extremely labor intensive and could not be achieved under the  
1552 TSCA statutory deadlines for most chemical substances especially those that have a data-rich  
1553 database. Furthermore, EPA considered how evaluation of newer information in addition to the  
1554 key and supporting data and information would change the conclusions presented in previous  
1555 assessments.

1556

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<sup>2</sup> A PESO statement was used during the full text screening of environmental fate and transport data sources. PESO stands for Pathways and Processes, Exposure, Setting or Scenario, and Outcomes. A RESO statement was used during the full text screening of the engineering and occupational exposure literature. RESO stands for Receptors, Exposure, Setting or Scenario, and Outcomes.

<sup>3</sup> Examples of existing assessments are EPA's chemical assessments (e.g., previous work plan risk assessments, problem formulation documents), ATSDR's Toxicological Profiles and EPA's IRIS assessments. This is described in more detail in *Strategy for Conducting Literature Searches for PCE (PCE) Supplemental File to the TSCA Scope Document* ([U.S. EPA 2017j](#)).

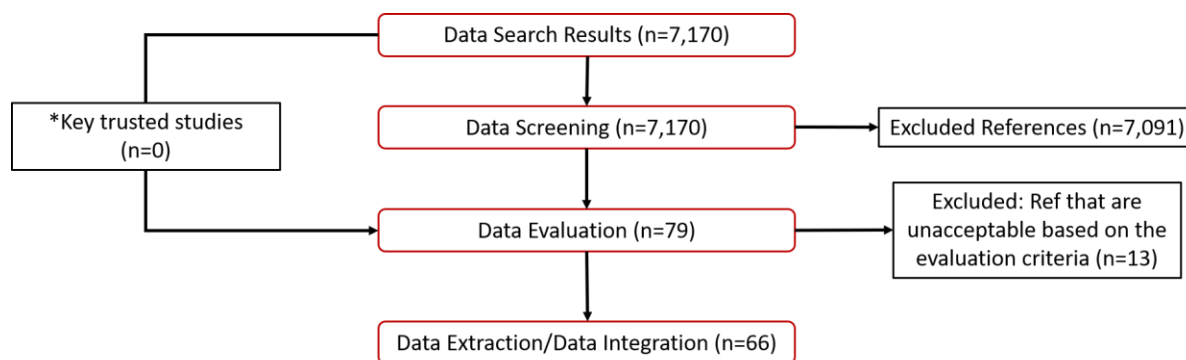
<sup>4</sup> Key and supporting data and information are those that support key analyses, arguments, and/or conclusions in the risk evaluation.

1557 This pragmatic approach allowed EPA to maximize the scientific and analytical efforts of other  
 1558 regulatory and non-regulatory agencies by accepting for the most part the relevant scientific  
 1559 knowledge gathered and analyzed by others except for influential information sources that may  
 1560 have an impact on the weight of the scientific evidence and ultimately the risk findings. The  
 1561 influential information (i.e., key/supporting) came from a smaller pool of sources subject to the  
 1562 rigor of the TSCA systematic review process to ensure that the risk evaluation uses the best  
 1563 available science and the weight of the scientific evidence.

1564  
 1565 The figures below depict literature flow diagrams illustrating the results of this process for each  
 1566 scientific discipline-specific evidence supporting the draft risk evaluation (Figure 1-5, Figure  
 1567 1-6, Figure 1-7, Figure 1-8 and Figure 1-9). Each diagram provides the total number of  
 1568 references at the start of each systematic review stage (i.e., data search, data screening, data  
 1569 evaluation, data extraction/data integration) and those excluded based on criteria guiding the  
 1570 screening and data quality evaluation decisions.

1571  
 1572 EPA made the decision to bypass the data screening step for data sources that were highly  
 1573 relevant to the draft risk evaluation as described above. These data sources are depicted as  
 1574 “key/supporting data sources” in the literature flow diagrams. Note that the number of  
 1575 “key/supporting data sources” were excluded from the total count during the data screening stage  
 1576 and added, for the most part, to the data evaluation stage depending on the discipline-specific  
 1577 evidence. The exception was the releases and occupational exposure data sources that were  
 1578 subject to a combined data extraction and evaluation step.

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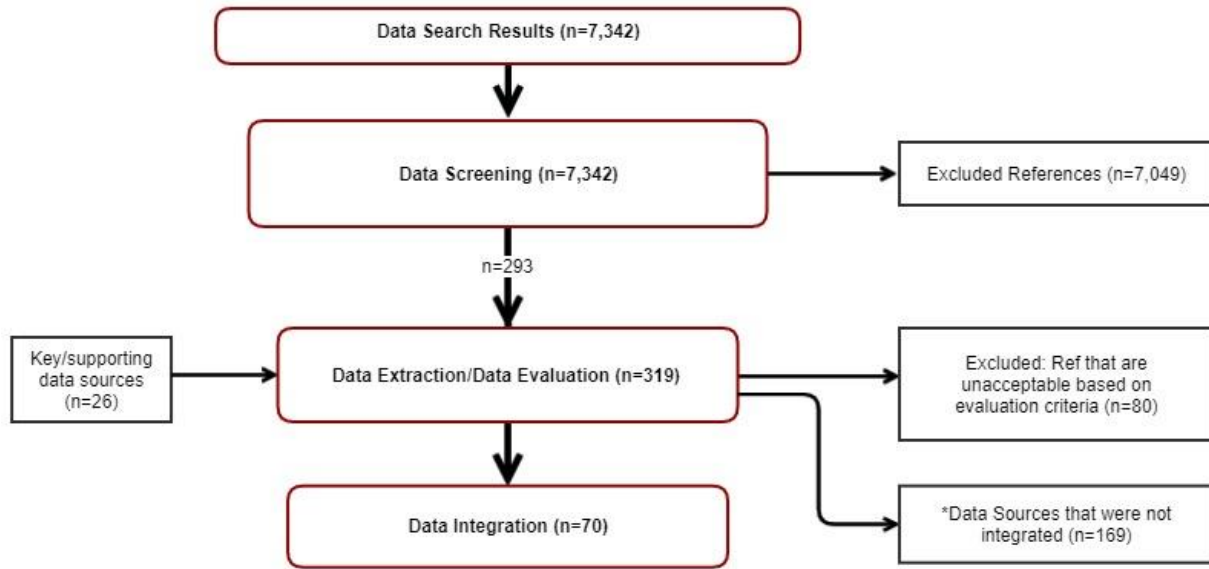


\*Any relevant studies from prior assessments that were identified as potentially relevant for TSCA assessment needs bypassed the data screening step and moved directly to the data evaluation step (e.g. key supporting studies from IRIS assessments, ATSDR assessments, ECHA dossiers, etc.).

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**Figure 1-5. Literature Flow Diagram for Environmental Fate Information**

Note: Literature search results for the environmental fate and transport of PCE yielded 7,170 studies. During problem formulation, following data screening, most environmental exposure pathways were removed from the conceptual models. As a result, 7,091 studies were deemed off-topic and excluded. The remaining 79 studies related to environmental exposure pathways retained in the conceptual models entered data evaluation, where 13 studies were deemed unacceptable and 66 moved into data extraction and integration. Note: Data sources identified relevant to physical-chemical properties were not included in this literature flow diagram. The data quality evaluation of physical-chemical properties studies can be found in the supplemental document, (U.S. EPA 2019c) and the extracted data are presented in Table 1-1.



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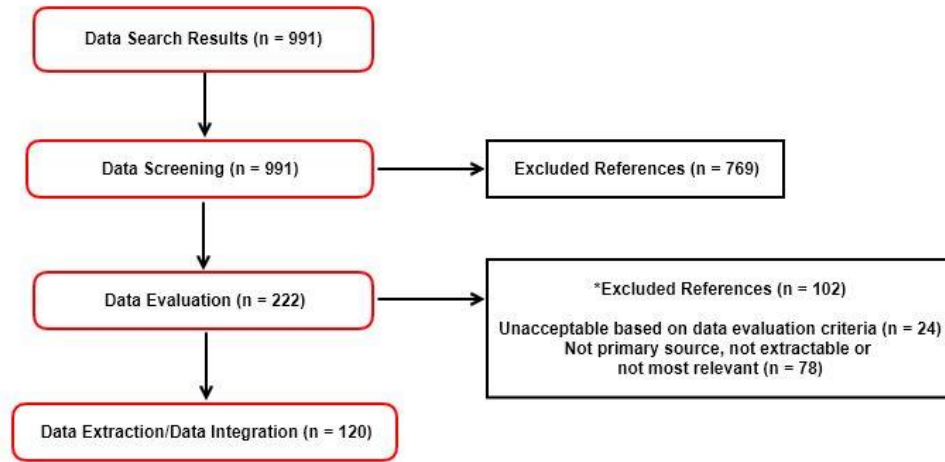
**Figure 1-6. Literature Flow Diagram for Engineering Releases and Occupational Exposure**

\*The quality of data in these sources (n=201) were acceptable for risk assessment purposes, but they were ultimately excluded from further consideration based on EPA’s integration approach for environmental release and occupational exposure data/information. EPA’s approach uses a hierarchy of preferences that guide decisions about what types of data/information are included for further analysis, synthesis and integration into the environmental release and occupational exposure assessments. EPA prefers using data with the highest rated quality among those in the higher level of the hierarchy of preferences (i.e., data > modeling > occupational exposure limits or release limits). If warranted, EPA may use data/information of lower rated quality as supportive evidence in the environmental release and occupational exposure assessments.

Note: Literature search results for environmental release and occupational exposure yielded 7,342 data sources. Of these data sources, 316 were determined to be relevant for the risk evaluation through the data screening process. These relevant data sources were entered into the data extraction/evaluation phase. After data extraction/evaluation, EPA identified several data gaps and performed a supplemental, targeted search to fill these gaps (e.g. to locate information needed for exposure modeling). The supplemental search yielded 32 relevant data sources that bypassed the data screening step and were evaluated and extracted in accordance with *Appendix D: Data Quality Criteria for Occupational Exposure and Release Data of the Application of Systematic Review for TSCA Risk Evaluations* document ([U.S. EPA 2018c](#)). Of the 348 sources from which data were extracted and evaluated, 90 sources only contained data that were rated as unacceptable based on serious flaws detected during the evaluation. Of the 258 sources forwarded for data integration, data from 57 sources were integrated, and 201 sources contained data that were not integrated (e.g., lower quality data that were not needed due to the existence of higher quality data, data for release media that were removed from scope after data collection).



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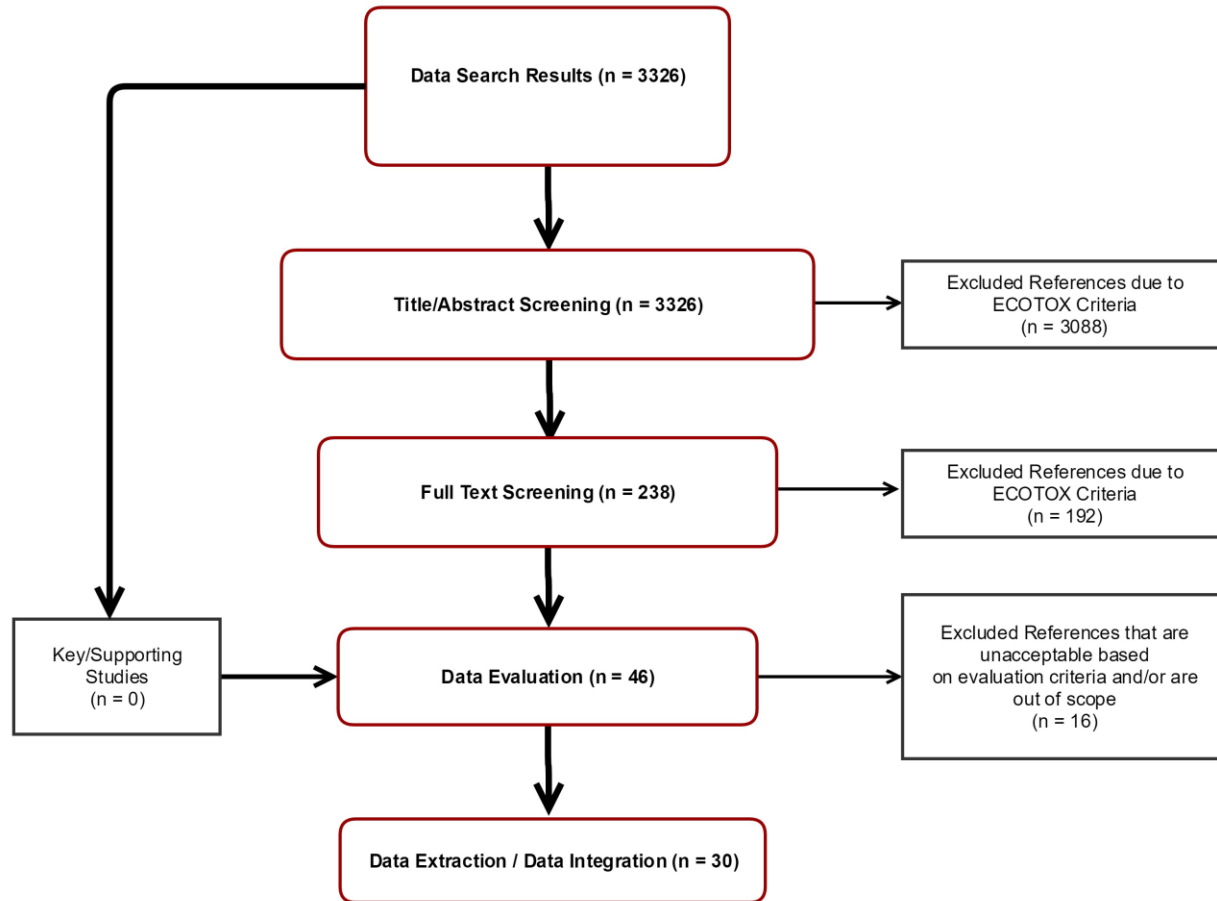


\*The quality of data in these sources were acceptable for risk assessment purposes and considered for integration. The sources; however, were not extracted for a variety of reasons, such as they contained only secondary source data, duplicate data, or non-extractable data (i.e., charts or figures). Additionally, some data sources were not as relevant to the PECO as other data sources which were extracted.

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**Figure 1-7. Literature Flow Diagram for Consumer and Environmental Exposure Data Sources**

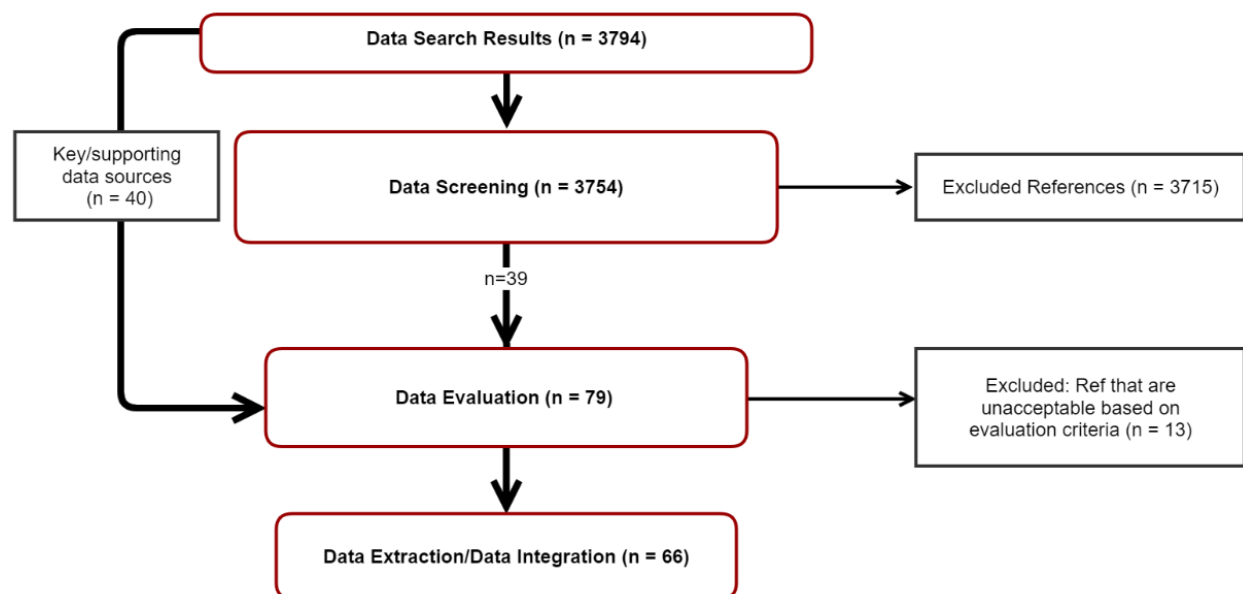
Note: EPA conducted a literature search to determine relevant data sources for assessing exposures for perchloroethylene within the scope of the risk evaluation. This search identified 991 data sources including relevant supplemental documents. Of these, 769 were excluded during the screening of the title, abstract, and/or full text and 222 data sources were recommended for data evaluation across up to five major study types in accordance with *Appendix E: Data Quality Criteria for Studies on Consumer, General Population and Environmental Exposure of the Application of Systematic Review for TSCA Risk Evaluations* document ([U.S. EPA 2018b](#)). Following the evaluation process, 120 references were forwarded for further extraction and data integration. EPA has not developed data quality criteria for all types of exposure information, some of which may be relevant when estimating consumer exposures. This is the case for absorption and permeability data and some product-specific data such as density and weight fraction often reported in Safety Data Sheets. As appropriate, EPA evaluated and summarized these data to determine their utility with supporting the risk evaluation.



**Figure 1-8. Literature Flow Diagram for Environmental Hazard Data Sources**

Note: The environmental hazard data sources were identified through literature searches and screening strategies using the ECOTOX Standing Operating Procedures. Additional details about the process can be found in the Strategy for Conducting Literature Searches for PCE: Supplemental File for the TSCA Scope Document (U.S. EPA 2017i). During problem formulation, EPA made refinements to the conceptual models resulting in the elimination of the terrestrial exposure pathway. Thus, environmental hazard data sources on terrestrial organisms were considered out of scope and excluded from data quality evaluation.

The literature search process for environmental hazard data found 3326 citations for PCE. At the title and abstract screening phase, 3088 citations were excluded as off-topic using ECOTOXicology knowledgebase criteria. The remaining 238 citations underwent a more thorough full text screening using the same criteria to determine which citations should undergo data evaluation. For data evaluation, EPA developed data quality evaluation (DQE) criteria to evaluate the data under TSCA, based on a combination of EPA's ECOTOXicology knowledgebase (ECOTOX) criteria and the Criteria for Reporting and Evaluating ecotoxicity Data (CRED). There were 46 citations that went to data evaluation for PCE. EPA analyzed each of these studies using the DQE results to determine overall study quality. Thirty studies were considered acceptable and were rated high, medium, or low quality during this analysis. The extracted data from these 30 studies were used during data integration for PCE.



1654  
1655 **Figure 1-9. Literature Flow Diagram for Human Health Hazard Data Sources**

1656 Note: The literature search results for human health hazard of PCE yielded 3794 studies. This included 40 key and  
1657 supporting studies identified from previous EPA assessments. Of the 3754 new studies screened for relevance, 3715  
1658 were excluded as off topic. The remaining 39 new studies together with the 40 key and supporting studies entered  
1659 data evaluation. Thirteen studies were deemed unacceptable based on the evaluation criteria for human health hazard  
1660 data sources and the remaining 66 studies were carried forward to data extraction/data integration. Additional details  
1661 can be found in the *PCE Bibliography: Supplemental File for the TSCA Scope Document*, ([U.S. EPA 2017e](#)).  
1662

### 1663 1.5.2 Data Evaluation

1664 During the data evaluation stage, the EPA assesses the quality of the methods and reporting of  
1665 results of the individual studies identified during problem formulation using the evaluation  
1666 strategies described in *Application of Systematic Review in TSCA Risk Evaluations* ([U.S. EPA](#)  
1667 [2018b](#)). The EPA evaluated the quality of the on-topic PCE study reports identified in  
1668 *Perchloroethylene (CASRN 127-18-4) Bibliography: Supplemental File for the TSCA Scope*  
1669 *Document*; ([U.S. EPA 2017e](#)), and gave all studies an overall high, medium, low or unacceptable  
1670 confidence rating during data evaluation.

1671  
1672 The results of the data quality evaluations for key studies are summarized in Section 2.1 (Fate and  
1673 Transport), Section 2.2 (Releases to the Environment), Section 2.3 (Environmental Exposures),  
1674 Section 2.4 (Human Exposures), Section 3 (Environmental Hazards) and Section 3.2 (Human  
1675 Health Hazards). Supplemental files (5.3.68 Appendix B) also provide details of the data  
1676 evaluations including individual metric scores and the overall study score for each data source.

### 1677 1.5.3 Data Integration

1678 Data integration includes analysis, synthesis and integration of information for the risk  
1679 evaluation. During data integration, the EPA considers quality, consistency, relevancy,  
1680 coherence and biological plausibility to make final conclusions regarding the weight of the  
1681 scientific evidence. As stated in *Application of Systematic Review in TSCA Risk Evaluations*  
1682 ([U.S. EPA 2018b](#)), data integration involves transparently discussing the significant issues,  
1683 strengths, and limitations as well as the uncertainties of the reasonably available information and

1684 the major points of interpretation ([U.S. EPA 2018e](#)). EPA defines “reasonably available  
1685 information” to mean information that EPA possesses, or can reasonably obtain and synthesize  
1686 for use in risk evaluations, considering the deadlines for completing the evaluation ([U.S. EPA](#)  
1687 [2017h](#)).

1688  
1689 EPA used previous assessments (see Table 1-3) to identify key and supporting information and  
1690 then analyzed and synthesized available evidence regarding PCE’s chemical properties,  
1691 environmental fate and transport properties and its potential for exposure and hazard. EPA’s  
1692 analysis also considered recent data sources that were not considered in the previous assessments  
1693 (1.5.1) as well as reasonably available information on potentially exposed or susceptible  
1694 subpopulations.

1695  
1696 The exposures and hazards sections describe EPA’s analysis of the influential information (i.e.,  
1697 key and supporting data) that were found acceptable based on the data quality reviews as well as  
1698 discussion of other scientific knowledge using the approach described in Section 1.5.1. The  
1699 exposure section also describes whether aggregate or sentinel exposures to a chemical substance  
1700 were considered under the conditions of use within the scope of the risk evaluation, and the basis  
1701 for that consideration.

1702

1703

## 1704 2 EXPOSURES

1705

### 1706 2.1 Fate and Transport

1707 Environmental fate includes both transport and transformation processes. Environmental  
1708 transport is the movement of the chemical within and between environmental media.

1709 Transformation occurs through the degradation or reaction of the chemical with other species in  
1710 the environment. Hence, knowledge of the environmental fate of the chemical informs the  
1711 determination of the specific exposure pathways and potential human and environmental  
1712 receptors EPA has considered during risk evaluation.

#### 1713 2.1.1 Fate and Transport Approach and Methodology

1714 Fate data including biotic and abiotic degradation rates, removal during wastewater treatment,  
1715 volatilization from lakes and rivers, and organic carbon:water partition coefficient (log  $K_{OC}$ )  
1716 were used when describing the fate of PCE. EPA gathered and evaluated environmental fate  
1717 information according to the process described in the *Application of Systematic Review in TSCA*  
1718 *Risk Evaluations* (U.S. EPA 2018b). Table 2-1 provides environmental fate data that EPA  
1719 considered while assessing the fate of PCE. This data was updated after problem formulation  
1720 with information identified through systematic literature review. Additional study summaries are  
1721 in the supplemental document, *Draft Risk Evaluation for Perchloroethylene, Systematic Review*  
1722 *Supplemental File: Data Extraction Tables for Environmental Fate and Transport Studies* (U.S.  
1723 EPA 2020h), and complete information on data quality evaluations for all identified fate data are  
1724 available in the supplemental document, *Draft Risk Evaluation for Perchloroethylene, Systematic*  
1725 *Review Supplemental File: Data Quality Evaluation for Environmental Fate and Transport*  
1726 *Studies* (U.S. EPA 2020j). Environmental fate properties not adequately reported in the literature  
1727 were estimated using Estimation Programs Interface (EPI) Suite™ models, as described in  
1728 Appendix C.

1729

1730 **Table 2-1. Environmental Fate Characteristics of PCE**

Property or Endpoint	Value <sup>a</sup>	References	Data Quality Rating
Indirect photodegradation	Atmospheric lifetime = 80-251 days, equivalent to half-life = 55-174 days (estimated for removal by reaction with hydroxyl radical, •OH)	(Cupitt 1987)	High
Hydrolysis half-life	8.8 months	(Dilling et al. 1975)	High
	> Years	(Jeffers et al. 1989)	High
Aerobic Biodegradation	86-87% in 28 days	(Tabak et al. 1981)	High
	74% in batch-fed reactor	(Long et al. 1993)	High
	0% in continuous-flow system	(Bouwer and McCarty 1982)	High
	0% in 175 days	(Bouwer et al. 1981)	Low

Property or Endpoint	Value <sup>a</sup>	References	Data Quality Rating
	Loss of PCE in some studies may be due to volatilization	( <a href="#">Namkung and Rittmann 1987</a> ; <a href="#">Wakeham et al. 1983</a> )	Medium, Medium
Anaerobic Biodegradation	100% in 37 days	( <a href="#">Cabirol et al. 1996</a> )	High
	Approx. 38% in 30 days	( <a href="#">Wood et al. 1981</a> )	High
	44%-68% in 112 days	( <a href="#">Bouwer et al. 1981</a> )	High
Bioconcentration factor (BCF)	25.8-77.1 (fish)	( <a href="#">Kawasaki 1980</a> )	High
	49 (fish)	( <a href="#">Barrows et al. 1980</a> )	High
	39.7 (fish)	( <a href="#">Dow Chem 1973</a> )	High
	312 and 118 (marine algae)	( <a href="#">Wang et al. 1996</a> )	High
Bioaccumulation factor (BAF)	46 (estimated) <sup>b</sup>	( <a href="#">ECB 2005</a> ); ( <a href="#">U.S. EPA 2012a</a> )	High
Organic carbon:water partition coefficient (log K <sub>oc</sub> )	2.95 (estimated) <sup>b</sup>	( <a href="#">U.S. EPA 2012a</a> )	High

<sup>a</sup> Measured unless otherwise noted.

<sup>b</sup> Information was estimated using EPI Suite™ ([U.S. EPA 2012a](#))

## 1731 2.1.2 Summary of Fate and Transport

1732 The EPI Suite™ module that estimates chemical removal in sewage treatment plants (“STP”  
 1733 module) was run using default settings to evaluate the potential for PCE to be removed from  
 1734 wastewater. The STP module estimates that a total of 88% of PCE in wastewater will be  
 1735 removed, 82% by volatilization and 6% by adsorption to sludge organic matter. Based on the  
 1736 mixed aerobic biodegradation data reported for PCE (ranging from rapid to negligible  
 1737 biodegradation in aerobic environments; see Table 2-1) the overall removal of PCE in  
 1738 wastewater treatment plants is expected to range from 88% to complete. PCE has moderate  
 1739 potential to sorb to sludge organic matter and thus is expected to be present in biosolids  
 1740 (processed sludge). When biosolids are land applied, PCE will volatilize from solid and liquid  
 1741 phases during and after spraying, although some PCE may partition from biosolids into soil and  
 1742 groundwater.

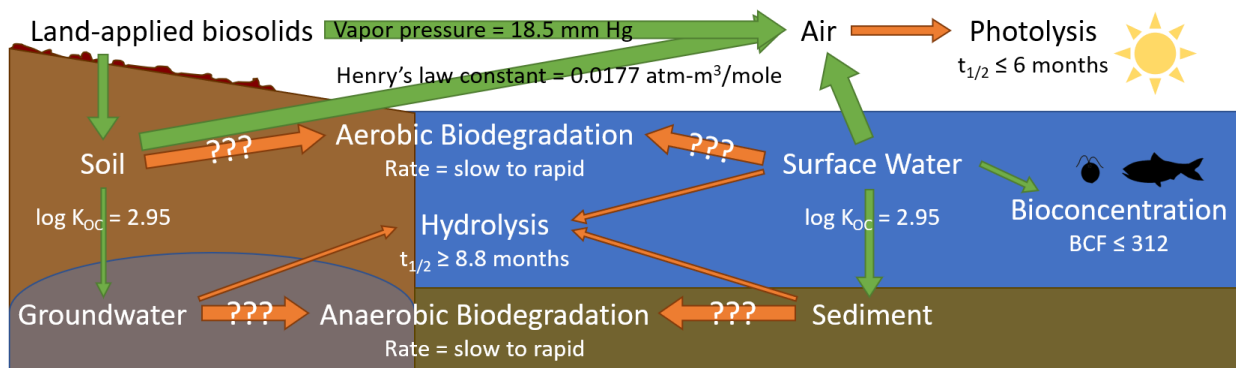
1743  
 1744 In soil and aquifers, PCE has moderate potential to sorb to soil or sediment organic matter and  
 1745 may be transported to ground water. Anaerobic biodegradation, which is reported to be rapid to  
 1746 very slow depending on local conditions and microbial populations ([WHO 2006a](#); [ECB 2005](#)),  
 1747 may be a significant degradation mechanism in soil and groundwater but. In anaerobic  
 1748 environments, PCE biodegradation products include potentially hazardous substances including  
 1749 trichloroethylene, cis-1,2 dichloroethene and vinyl chloride ([de Bruin et al. 1992](#)).  
 1750

1751 Based on its Henry's Law constant (0.0177 atm-m<sup>3</sup>/mole) and vapor pressure (18.5 mmHg at  
 1752 20°C), PCE can be expected to volatilize from surface water to air and from soil to air. The EPI  
 1753 Suite™ model that predicts volatilization for surface water ("Volatilization" module) estimated  
 1754 the PCE volatilization half-life from a model river to be 1.4 hours, and the volatilization half-life  
 1755 from a model lake to be 123 hours (5.1 days). In the vapor phase, PCE can be slowly  
 1756 transformed by reaction with hydroxyl and other radicals with half-lives of months or greater,  
 1757 and long-range transport may occur. In the atmosphere, PCE is expected to slowly degrade via  
 1758 indirect photolysis (half-life ≥ 80 days). Given its slow photodegradation, PCE is expected to  
 1759 undergo long-range atmospheric transport.

1760  
 1761 With measured bioconcentration factors of 312 or lower and estimated bioaccumulation factor of  
 1762 46, the bioaccumulation potential of PCE is low.

1763  
 1764 Overall, PCE has moderate potential to accumulate in wastewater biosolids, soil, and sediment,  
 1765 and has low potential to biota and is expected to largely volatilize to the atmosphere where it  
 1766 may undergo long-range transport and slowly degrade via indirect photolysis. The fate of PCE in  
 1767 the environment is summarized in Figure 2-1.

1768



1769  
 1770 **Figure 2-1. Diagram demonstrating the transport, partitioning, and degradation of PCE in**  
 1771 **the environment**

1772  
 1773 In Figure 2-1, transport and partitioning are indicated by green arrows and degradation is  
 1774 indicated by orange arrows. The width of the arrow is a qualitative indication of the likelihood  
 1775 that the indicated partitioning will occur or the rate at which the indicated degradation will occur  
 1776 (i.e., wider arrows indicate more likely partitioning or more rapid degradation). The question  
 1777 marks over the aerobic and anaerobic biodegradation arrows indicate uncertainty regarding how  
 1778 quickly PCE will biodegrade. Although transport and partitioning processes (green arrows) can  
 1779 occur in both directions, the image illustrates the primary direction of transport indicated by  
 1780 partition coefficients. Figure 2-1 considers only transport, partitioning, and degradation within  
 1781 and among environmental media; sources to the environment such as discharge and disposal are  
 1782 not illustrated.

1783 **2.1.3 Key Sources of Uncertainty in Fate and Transport Assessment**

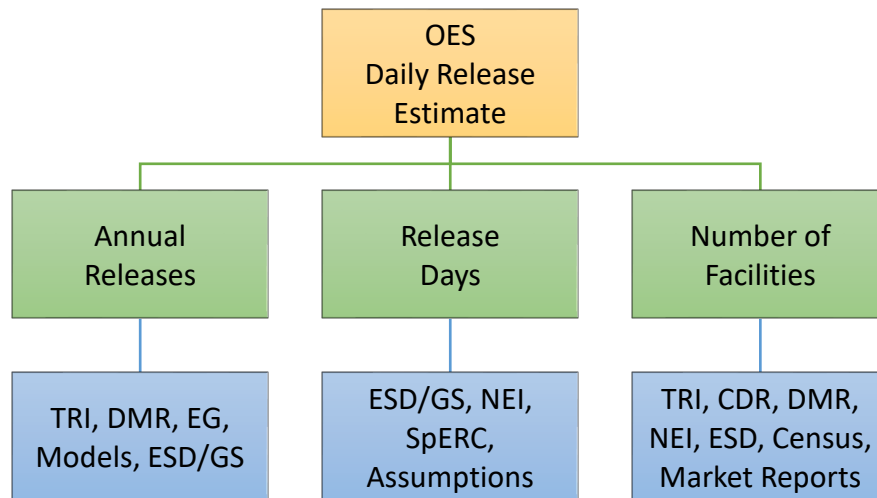
1784 The experimentally determined PCE biodegradation rates in aerobic and anaerobic environments  
 1785 ranged from slow to rapid (see Table 2-1). For comparison, the EPI Suite™ module that predicts  
 1786 biodegradation rates ("BIOWIN" module) was run using default settings to estimate

1787 biodegradation rates of PCE. The BIOWIN models for aerobic environments (BIOWIN 1-6)  
 1788 estimate that PCE will not rapidly biodegrade in aerobic environments. The BIOWIN model of  
 1789 anaerobic biodegradation (BIOWIN 7) predicts that PCE will biodegrade under anaerobic  
 1790 conditions. Overall, PCE biodegradation rates in the environment may vary based on factors  
 1791 including level of oxygenation, microorganisms present, and microorganisms' previous exposure  
 1792 and adaptation to PCE. This uncertainty in biodegradation rates was considered in the assessment  
 1793 of persistence in aerobic and anaerobic environments and estimates of removal from wastewater.

1794 **2.2 Releases to the Environment**

1795 **2.2.1 Environmental Discharges of Wastewater**

1796 EPA categorized the conditions of use (COUs) listed in Table 1-4 into 22 Occupational Exposure  
 1797 Scenarios (OES). For each OES, a daily wastewater discharge was estimated based on annual  
 1798 releases, release days, and the number of facilities (Figure 2-2). In this section, EPA describes its  
 1799 approach and methodology for estimating daily wastewater discharges, and for each OES,  
 1800 provides a summary of release days, number of facilities, and daily wastewater discharges. For  
 1801 detailed facility level results, see the “Water Release Assessment” section for each OES in the:  
 1802 *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene*  
 1803 *(Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA](#)  
 1804 [2020d](#)).



1806  
 1807 **Figure 2-2. An overview of EPA’s Approach to Estimate Daily Wastewater Discharges<sup>5</sup>.**

1808 **2.2.1.1 Results for Daily Wastewater Discharge Estimates**

1809 EPA combined its estimates for annual releases, release days, and number of facilities to estimate  
 1810 a range for daily wastewater discharges for each OES. A summary of these ranges across  
 1811 facilities is presented in Table 2-2. Summary of EPA’s Daily Wastewater Discharge Estimates

<sup>5</sup> TRI = Toxics Release Inventory; DMR = Discharge Monitoring Report; NEI = National Emissions Inventory; CDR = Chemical Data Reporting; EG = Effluent Guidelines; ESD = Emission Scenario Document; GS = Generic Scenarios; SpERC = Specific Environmental Release Category



1812 for Each OES. For some OES, EPA was not able to estimate or did not expect water releases. For  
1813 example:

1814

1815 • **OES Aerosol Degreasing and Aerosol Lubricants:** Wastewater discharges containing  
1816 PCE were not expected due to its volatility; releases from this OES are expected to be to  
1817 air.

1818 • **OES Wipe Cleaning and Metal/Stone Polishes:** Wastewater discharges containing  
1819 PCE were not expected due to its volatility and the nature of the wipe cleaning and  
1820 polishing process; releases from this OES are expected to be to air (volatilization) or with  
1821 shop rags to landfill/incineration.

1822 • **OES Other Spot Cleaning/Spot Removers (Including Carpet Cleaning):** EPA did not  
1823 identify data to estimate wastewater discharges for this OES.

1824 • **OES Laboratory Chemicals:** EPA did not identify data to estimate wastewater  
1825 discharges for this OES.

1826

1827 **Table 2-2. Summary of EPA’s Daily Wastewater Discharge Estimates for Each OES<sup>6</sup>**

Occupational Exposure Scenario (OES)	Release Media/Treatment Facility Type <sup>a</sup>	Number of Sites with Wastewater Discharges <sup>b</sup>	Estimated Daily Release Range Across Sites (kg/site-day) <sup>c</sup>		Overall Confidence	Corresponding Section in the Supplemental Engineering Report ( <a href="#">U.S. EPA 2019a</a> )
			Minimum <sup>d</sup>	Maximum		
Manufacturing	Surface Water	1	1.7E-03		M	Section 2.1.4
	Non-POTW WWT	1	4.1E-02		M	
	Surface Water or POTW <sup>e</sup>	4	8.9E-05	0.1	M	
Repackaging	Surface Water	3	9.1E-05	4.8E-03	M	Section 2.2.4
	Non-POTW WWT	1	1.1		M	
Processing as a Reactant	Surface Water	18	1.2E-05	1.3	M	Section 2.3.4
	POTW	1	0.1		M	
Incorporation into Formulation, Mixture, or Reaction Product	Surface Water	1	1.7E-03		M	Section 2.4.4
	POTW	1	1.5E-03		M	
	Non-POTW WWT	1	5.3		M	
Batch Open-Top Vapor Degreasing <sup>f</sup>	Surface Water	16	9.0E-07	7.1E-02	M	Section 2.5.4
	POTW	1	3.5E-04		M	

<sup>6</sup> Although EPA has identified both industrial and commercial uses here for purposes of distinguishing scenarios in this document, the Agency interprets the authority over “any manner or method of commercial use” under TSCA section 6(a)(5) to reach both.

PEER REVIEW DRAFT. DO NOT CITE OR QUOTE

Occupational Exposure Scenario (OES)	Release Media/Treatment Facility Type <sup>a</sup>	Number of Sites with Wastewater Discharges <sup>b</sup>	Estimated Daily Release Range Across Sites (kg/site-day) <sup>c</sup>		Overall Confidence	Corresponding Section in the Supplemental Engineering Report ( <a href="#">U.S. EPA 2019a</a> )
			Minimum <sup>d</sup>	Maximum		
Batch Closed-Loop Vapor Degreasing	Included with release estimates for Batch Open Top Vapor Degreasing <sup>f</sup> .					Section 2.6.4
Conveyorized Vapor Degreasing	Included with release estimates for Batch Open Top Vapor Degreasing <sup>f</sup> .					Section 2.7.4
Web Vapor Degreasing	Included with release estimates for Batch Open Top Vapor Degreasing <sup>f</sup> .					Section 2.8.4
Cold Cleaning	Included with release estimates for Batch Open Top Vapor Degreasing <sup>f</sup> .					Section 2.9.4
Aerosol Degreasing and Aerosol Lubricants	EPA does not expect wastewater discharges containing PCE from these sites.				H	Section 2.10.4
Dry Cleaning and Spot Cleaning (commercial)	POTW	12,822	5.6E-04	1.7E-03	M	Section 2.11.4
Dry Cleaning and Spot Cleaning (industrial)	Surface Water	2	4.5E-05	2.1E-04	M	Section 2.11.4
Adhesives, Sealants, Paints, and Coatings	POTW	41	2.0	370	M	Section 2.12.4
Maskant For Chemical Milling	Surface Water	3	5.9E-06	8.6E-04	M	Section 2.13.4
	POTW	2	2.6E-03	1.1E-02	M	
Industrial Processing Aid	Surface Water	12	3.0E-04	8.6E-02	M	Section 2.14.4

PEER REVIEW DRAFT. DO NOT CITE OR QUOTE

Occupational Exposure Scenario (OES)	Release Media/Treatment Facility Type <sup>a</sup>	Number of Sites with Wastewater Discharges <sup>b</sup>	Estimated Daily Release Range Across Sites (kg/site-day) <sup>c</sup>		Overall Confidence	Corresponding Section in the Supplemental Engineering Report ( <a href="#">U.S. EPA 2019a</a> )
			Minimum <sup>d</sup>	Maximum		
	POTW	2 <sup>g</sup>	8.8E-02	0.4	M	
Metalworking Fluids	Included with release estimates for Batch Open Top Vapor Degreasing <sup>f</sup> .					Section 2.15.4
Wipe Cleaning and Metal/Stone Polishes	EPA does not expect wastewater discharges containing PCE from these sites.				H	Section 2.16.4
Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	EPA did not identify data to estimate wastewater discharges for this OES.					Section 2.17.4
Other Industrial Uses	Surface Water	7	1.1E-06	0.3	M	Section 2.18.4
Other Commercial Uses	Surface Water	7	1.3E-05	2.9E-03	M	Section 2.19.4
Laboratory Chemicals	EPA did not identify data to estimate wastewater discharges for this OES.					Section 2.20.4
Waste Handling, Disposal, Treatment, and Recycling	Surface Water	5	5.9E-05	3.8E-03	M	Section 2.21.4
	POTW	4	3.6E-07	0.3	M	
	Non-POTW WWT	4	5.4E-03	1.4	M	
Other Department of Defense Uses	EPA did not identify data to estimate wastewater discharges for this OES.					Section 2.22.4

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<sup>a</sup> The daily discharge estimates presented in this table represent both direct discharges to surface water and indirect discharges to POTW and non-POTW WWT. Removal efficiencies at POTWs and non-POTW WWT are taken into account in the environmental exposure assessment.

1830 <sup>b</sup> For most conditions of use, only a subset of the sites use are expected to discharge wastewater containing PCE. Other sites may dispose of PCE-containing  
1831 wastes through other means such as via landfill or incineration.  
1832 <sup>c</sup> Except for commercial dry cleaning estimates; the minimum and maximum daily discharge estimates are based on site-specific discharges (i.e., the minimum  
1833 corresponds to the site with the lowest discharge and the maximum corresponds to the site with the highest discharge). Minimum daily discharge at any given site  
1834 may be higher than the minimum presented, and the maximum daily discharge may be lower than the value presented.  
1835 <sup>d</sup> The minimum presented represents the minimum of the sites that have wastewater discharges, it does not include sites that dispose of PCE through other media  
1836 which would result in a minimum of zero for most OES.  
1837 <sup>e</sup> Discharges from these sites may be to either surface water or POTW but not both for a given site.  
1838 <sup>f</sup> EPA does not have enough information to distinguish whether these sites use PCE in OTVDs, closed-loop degreasers, conveyORIZED degreasers, web degreasers,  
1839 cold cleaners, or metalworking fluids. Therefore, the daily release estimates may include sites that perform any of these activities.  
1840 <sup>g</sup> These two sites reported both direct and indirect discharges.

1841 **2.2.1.2 Approach and Methodology**

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1842 **2.2.1.2.1 Wastewater Discharge Estimates**

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1843 EPA performed a literature search to identify process operations that could potentially result in  
1844 direct or indirect discharges to water for each condition of use. Where available, EPA used 2016  
1845 Toxics Release Inventory (TRI) ([U.S. EPA 2017k](#)) and 2016 Discharge Monitoring Report  
1846 (DMR) ([U.S. EPA 2016a](#)) data to provide a basis for estimating releases. Facilities are only  
1847 required to report to TRI if the facility has 10 or more full-time employees, is included in an  
1848 applicable NAICS code, and manufactures, processes, or uses the chemical in quantities greater  
1849 than a certain threshold (25,000 pounds for manufacturers and processors of PCE and 10,000  
1850 pounds for users of PCE). Due to these limitations, some sites that manufacture, process, or use  
1851 PCE may not report to TRI and are therefore not included in these datasets.

1852  
1853 For the 2016 DMR, EPA used the Water Pollutant Loading Tool within EPA’s Enforcement and  
1854 Compliance History Online (ECHO) to query all PCE point source water discharges in 2016.  
1855 DMR data are submitted by National Pollutant Discharge Elimination System (NPDES) permit  
1856 holders to states or directly to the EPA according to the monitoring requirements of the facility’s  
1857 permit. States are only required to load major discharger data into DMR and may or may not  
1858 load minor discharger data. The definition of major vs. minor discharger is set by each state and  
1859 could be based on discharge volume or facility size. Due to these limitations, some sites that  
1860 discharge PCE may not be included in the DMR dataset.

1861  
1862 Facilities reporting discharges in TRI and DMR also report associated NAICS and Standard  
1863 Industrial Classification (SIC) industry codes, respectively. Where possible, EPA reviewed the  
1864 NAICS and SIC descriptions for each reported discharge and mapped each facility to a potential  
1865 condition of use associated with occupational exposure scenarios (OES, see Table 2-12). For  
1866 facilities that did not report a NAICS or SIC code, EPA performed a supplemental internet  
1867 search of the specific facility to determine the mapping. Facilities that could not be mapped were  
1868 grouped together into an “Other” category.

1869  
1870 EPA’s preference was to use TRI or DMR data to assess wastewater discharges; however, due to  
1871 the reporting requirements for each dataset (described above in this section), these data may not  
1872 be available for all conditions of use or for all sites within a condition of use. In such cases, EPA  
1873 estimated wastewater discharges using release data from literature, relevant emission scenario  
1874 documents (ESD) or generic scenarios (GS), existing EPA/OPPT models, and/or relevant  
1875 Effluent Guidelines (EG). EG are national regulatory standards set forth by EPA for wastewater  
1876 discharges to surface water and municipal sewage treatment plants.

1877  
1878 When possible for each OES covering conditions of use, EPA estimated annual releases, average  
1879 daily releases, and number of release days/yr. Where TRI and/or DMR were available, EPA used  
1880 the reported annual releases for each site and estimated the daily release by averaging the annual  
1881 release over the estimated release days/yr. Where ESDs, GSs, existing models, or EGs were used  
1882 EPA estimated a daily release and calculated the annual release by multiplying the daily release  
1883 by the number of release days per year.

#### 1884 **2.2.1.2.2 Estimates of Number of Facilities**

1885 Where available, EPA used 2016 CDR ([U.S. EPA 2016d](#)), 2016 TRI ([U.S. EPA 2017k](#)), 2016  
1886 Discharge Monitoring Report (DMR) ([U.S. EPA 2016a](#)) and 2014 National Emissions Inventory  
1887 (NEI) ([U.S. EPA 2018a](#)) data to provide a basis to estimate the number of sites using PCE within  
1888 a condition of use. Generally, information for reporting sites in CDR and NEI was sufficient to  
1889 accurately characterize each reporting sites condition of use. However, information for  
1890 determining the condition of use for reporting sites in TRI and DMR is typically more limited.

1891  
1892 In TRI, sites submitting a Form R indicate whether they perform a variety of activities related to  
1893 the chemical including, but not limited to: produce the chemical; import the chemical; use the  
1894 chemical as a reactant; use the chemical as a chemical processing aid; and ancillary or other use.  
1895 In TRI, sites submitting Form A are not required to designate an activity. For both Form R and  
1896 Form A, TRI sites are also required to report the primary North American Industry Classification  
1897 System (NAICS) code for their site. For each TRI site, EPA used the reported primary NAICS  
1898 code and activity indicators to determine the condition of use at the site. For instances where  
1899 EPA could not definitively determine the condition of use because: 1) the report NAICS codes  
1900 could include multiple conditions of use; 2) the site report multiple activities; and/or 3) the site  
1901 did not report activities due to submitting a Form A, EPA had to make an assumption on the  
1902 condition of use to avoid double counting the site. For these sites, EPA supplemented the NAICS  
1903 code and activity information with the following information to determine a “most likely” or  
1904 “primary” condition of use:

- 1905 1. Information on known uses of the chemical and market data identifying the most  
1906 prevalent conditions of use of the chemical.
- 1907 2. Information obtained from public comments and/or industry meetings with EPA that  
1908 provided specific information on the site.

1909  
1910 In DMR, the only information reported on condition of use is each site’s Standard Industrial  
1911 Classification (SIC) code. EPA could not determine each reporting site’s condition of use based  
1912 on SIC code alone; therefore, EPA supplemented the SIC code information with the same  
1913 supplementary information used for the TRI sites (market data, public comments, and industry  
1914 meetings).

1915  
1916 Where the number of sites could not be determined using CDR/TRI/DMR/NEI or where  
1917 CDR/TRI/DMR/NEI data were determined to not capture the entirety of sites within a condition  
1918 of use, EPA supplemented the available data with U.S. economic data using the following  
1919 method:

- 1920  
1921 1. Identify the NAICS codes for the industry sectors associated with these uses.
- 1922 2. Estimate total number of sites using the U.S. Census’ Statistics of US Businesses (SUSB)  
1923 (SUSB Data) data on total establishments by 6-digit NAICS.
- 1924 3. Use market penetration data to estimate the percentage of establishments likely to be  
1925 using PCE instead of other chemicals.
- 1926 4. Combine the data generated in Steps 1 through 3 to produce an estimate of the number of  
1927 sites using PCE in each 6-digit NAICS code, and sum across all applicable NAICS codes  
1928 for the condition of use to arrive at a total estimate of the number of sites within the  
1929 condition of use.

1930

1931 Table 2-3 summarizes the number of facilities estimates for each OES. Based on reasonably  
1932 available data, EPA does not expect all sites within a condition of use will have wastewater  
1933 discharges containing PCE; therefore, the number of facilities estimates in Table 2-3 may be  
1934 greater than the number of sites presented in release summary in Table 2-2.

1935



1936 **Table 2-3. Summary of EPA's Estimates for the Number of Facilities for Each OES**

Occupational Exposure Scenario (OES)	Number of Facilities	Notes
Manufacturing	8	Based on CDR reporting
Repackaging	51	Based on TRI and DMR reporting
Processing as a Reactant	117	Based on TRI and DMR reporting
Incorporation into Formulation, Mixture, or Reaction Product	39	Based on TRI and DMR reporting
Batch Open-Top Vapor Degreasing	398 to 4,942	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Batch Closed-Loop Vapor Degreasing	13,912 to 25,546	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Conveyorized Vapor Degreasing	395 to 568	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Web Degreasing	395 to 568	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Cold Cleaning	17	Based on NEI reporting
Aerosol Degreasing and Aerosol Lubricants	75,938	Based on Census data and a market penetration of 29.6% based on California Air Resources Board (CARB) survey of automotive maintenance and repair facilities
Dry Cleaning and Spot Cleaning	12,822 (commercial) 12 (industrial)	Commercial estimate based on Census data and a market penetration of 60% based on information from the Dry Cleaning and Laundry Institute and the National Cleaners Association Industrial estimate based on U.S. EPA ( <a href="#">2006b</a> ) economics report
Adhesives, Sealants, Paints, and Coatings	60	Based on NEI reporting
Maskant for Chemical Milling	71	Based on stakeholder information from AC Products ( <a href="#">2017</a> )
Industrial Processing Aid	98	Based on TRI and DMR reporting
Metalworking Fluids	-	No information identified to estimate number of facilities
Wipe Cleaning and Metal/Stone Polishes	-	No information identified to estimate number of facilities
Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	-	No information identified to estimate number of facilities
Other Industrial Uses	130	Based on TRI and DMR reporting
Other Commercial Uses	-	No information identified to estimate number of facilities
Laboratory Chemicals	-	No information identified to estimate number of facilities
Waste Handling, Disposal, Treatment, and Recycling	94	Based on TRI and DMR reporting
Other Department of Defense Uses	-	No information identified to estimate number of facilities

1937

1938

**2.2.1.2.3 Estimates of Release Days**

1939 EPA referenced ESDs, NEI data, SpERCs, or needed to make assumptions when estimating  
 1940 release days for each OES. A summary along with a brief explanation is presented in Table 2-4  
 1941 below.

1942

1943

**Table 2-4. Summary of EPA's Estimates for Release Days for Each OES**

<b>Occupational Exposure Scenario (OES)</b>	<b>Release Days</b>	<b>Notes</b>
Manufacturing	350	Assumes operation seven days/week and 50 weeks/yr with two weeks down for shutdown activities
Repackaging	250	Assumed 5 days per week and 50 weeks per year
Processing as a Reactant	350	Assumes operation seven days/week and 50 weeks/yr with two weeks down for shutdown activities
Incorporation into Formulation, Mixture, or Reaction Product	300	SpERC for the formulation and (re)packing of substances and mixtures ( <a href="#">European Solvents Industry 2019</a> )
Batch Open-Top Vapor Degreasing	260	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Batch Closed-Loop Vapor Degreasing	260	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Conveyorized Vapor Degreasing	260	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Web Degreasing	260	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Cold Cleaning	260	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Aerosol Degreasing and Aerosol Lubricants	-	Wastewater discharges not expected from this OES
Dry Cleaning and Spot Cleaning	250 to 312	Assumes facilities may operate five days/week and 50 weeks/yr at the low-end up to six days/week and 52 weeks/yr at the high-end
Adhesives, Sealants, Paints, and Coatings	250	Assumed 5 days per week and 50 weeks per year
Maskant for Chemical Milling	172 to 208	Based on NEI reporting
Industrial Processing Aid	300	SpERC for the manufacture of a substance (which includes use as a process chemical or extraction agent) ( <a href="#">European Solvents Industry 2012</a> )
Metalworking Fluids	260	2017 Draft ESD on the Use of Vapor Degreasers ( <a href="#">OECD 2017a</a> )
Wipe Cleaning and Metal/Stone Polishes	-	Wastewater discharges not expected from this OES
Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	-	No information identified to estimate wastewater discharges from this OES

Occupational Exposure Scenario (OES)	Release Days	Notes
Other Industrial Uses	250	Assumed 5 days per week and 50 weeks per year
Other Commercial Uses	250	Assumed 5 days per week and 50 weeks per year
Laboratory Chemicals	-	No information identified to estimate wastewater discharges from this OES
Waste Handling, Disposal, Treatment, and Recycling	250	Assumed 5 days per week and 50 weeks per year
Other Department of Defense Uses	-	No information identified to estimate wastewater discharges from this OES

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**2.2.1.3 Assumptions, Key Sources of Uncertainty, and Overall Confidence for Environmental Releases**

Table 2-5 provides a summary of the assumptions, key sources of uncertainty, and EPA’s overall confidence in its release estimates for each of the OES assessed.

**Table 2-5. Summary of Assumptions, Uncertainty, and Overall Confidence in Release Estimates by OES**

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
Manufacturing	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 TRI for four sites. TRI data were determined to have a “medium” data quality rating through EPA’s systematic review process. Specifically, the data were scored high for representativeness of geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of “medium”. The “low” scores are a result of the information available in each data source. For example, neither TRI nor DMR include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> EPA assumed 350 days/yr of operation (7 days/week, 50 weeks/yr with two weeks for turnaround) and averaged the annual discharges over the operating days. There is some uncertainty that all sites manufacturing PCE will operate for this duration as some sites may operate less than 7 days/wk or may have turnarounds greater than or less than the assumed 2 weeks/yr. Therefore, the average daily discharges may be higher if sites operate for fewer than 350 days/yr or lower if they operate for greater than 350 days/yr. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day due to changes in process conditions (e.g., total wastewater flow) such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p>

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
	<p><b>Strengths in Discharges Assessed Using Effluent Guidelines:</b> The discharges estimated using the EG are within an order of magnitude of the discharges reported by sites in TRI. The exception to this is the Solvents &amp; Chemicals site which had a much lower production volume than the averaged assessed at all other sites.</p> <p><b>Uncertainties in Discharges Assessed Using Effluent Guidelines:</b> Water discharges from the remaining four sites were estimated using the maximum daily and monthly discharge limits in the OCPSF (Organic Chemicals, Plastics and Synthetic Fibers) EG and the estimated volume of wastewater produced per pound of PCE production from the SpERC developed by the European Solvent Industry Group for the manufacture of a substance. The estimates assume the sites operate at the limits set by the EG; actual releases may be lower for sites operating below the limits or higher for sites not in compliance with the OCPSF EG. Furthermore, the production volumes used to estimate discharges for three of the four sites are based on the average production volume. Each site may manufacture volumes greater than or less than the average resulting in higher or lower discharge volumes, respectively.</p> <p><b>Uncertainties in the Number of Sites Estimate:</b> Information to determine the activity at two of the assessed sites as manufacture or import was not publicly available. It is possible these two sites are importers and not manufacturers; thus, eliminating the wastewater discharges from manufacturing at these sites (note: the sites may have other wastewater discharges of PCE depending on the conditions of use at the site).</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score and the uncertainties in the daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates for the four sites in the 2016 TRI. Based on the uncertainties in using effluent guidelines and the number of sites, EPA has a medium confidence in the wastewater discharge estimates for the four sites assessed using the OCPSF EG.</p>
Repackaging	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 TRI and the 2016 DMR. TRI and DMR data were determined to have a “medium” data quality rating through EPA’s systematic review process. Specifically, the TRI and DMR data were scored high for representativeness of geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of medium. The “low” scores are a result of the information available in each data source. For example, neither TRI nor DMR include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> Due to reporting requirements for TRI and DMR, the number of sites in this OES may be underestimated. It is uncertain the extent that sites not captured in these databases discharge wastewater containing PCE and whether any such discharges would be to</p>

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
	<p>surface water, POTW, or non-POTW WWT. Additionally, information on the conditions of use of PCE at facilities in TRI and DMR is limited; therefore, there is some uncertainty as to whether all of the sites assessed in this section are performing repackaging activities rather than a different condition of use. If the sites were categorized under a different OES, the annual wastewater discharges for each site would remain unchanged; however, average daily discharges may change depending on the number of operating days expected for the OES.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to TRI and DMR only report annual discharges; to assess daily discharges, EPA assumed 250 days/yr of operation and averaged the annual discharges over the operating days. There is some uncertainty that all sites repackaging PCE will repackaging PCE for this duration as some sites may not repackaging PCE every day while others may operate more than 5 days/week and 50 weeks/yr. Therefore, the average daily discharges may be higher if sites repackaging for fewer than 250 days/yr or lower if they repackaging for greater than 250 days/yr. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, and the uncertainties in the number of sites and daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates.</p>
Processing as a Reactant	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 TRI and the 2016 DMR. TRI and DMR data were determined to have a “medium” data quality rating through EPA’s systematic review process. Specifically, the TRI and DMR data were scored high for representativeness of geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of medium. The “low” scores are a result of the information available in each data source. For example, neither TRI nor DMR include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> Due to reporting requirements for TRI and DMR, the number of sites in this OES may be underestimated. It is uncertain the extent that sites not captured in these databases discharge wastewater containing PCE and whether any such discharges would be to surface water, POTW, or non-POTW WWT. Additionally, information on the conditions of use of PCE at facilities in TRI and DMR is limited; therefore, there is some uncertainty as to whether all of the sites assessed in this section are processing PCE as a reactant rather than a different condition of use. If the sites were categorized under a different OES, the annual wastewater discharges for each site would remain unchanged;</p>

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
	<p>however, average daily discharges may change depending on the number of operating days expected for the OES.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to TRI and DMR only report annual discharges; to assess daily discharges, EPA assumed 350 days/yr of operation (7 days/week, 50 weeks/yr with two weeks for turnaround) and averaged the annual discharges over the operating days. There is some uncertainty that all sites processing PCE as a reactant will operate for this duration as some sites may operate less than 7 days/wk, have turnarounds greater than or less than the assumed 2 weeks/yr, or not manufacture products that use PCE as a reactant every day. Therefore, the average daily discharges may be higher if sites operate for fewer than 350 days/yr or lower if they operate for greater than 350 days/yr. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, and the uncertainties in the number of sites and daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates.</p>
<p>Incorporation into Formulation, Mixture, or Reaction Product</p>	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 TRI and the 2016 DMR. TRI and DMR data were determined to have a “medium” data quality rating through EPA’s systematic review process. Specifically, the TRI and DMR data were scored high for representativeness of geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of medium. The “low” scores are a result of the information available in each data source. For example, neither TRI nor DMR include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> Due to reporting requirements for TRI and DMR, the number of sites in this OES may be underestimated. It is uncertain the extent that sites not captured in these databases discharge wastewater containing PCE and whether any such discharges would be to surface water, POTW, or non-POTW WWT. Additionally, information on the conditions of use of PCE at facilities in TRI and DMR is limited; therefore, there is some uncertainty as to whether all of the sites assessed in this section are performing formulation activities rather than a different condition of use. If the sites were categorized under a different OES, the annual wastewater discharges for each site would remain unchanged; however, average daily discharges may change depending on the number of operating days expected for the OES.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to TRI and DMR only report annual discharges; to assess daily discharges, EPA assumed 300 days/yr of operation and averaged the annual discharges over the operating days. There is some uncertainty that all sites formulating PCE-</p>

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
	<p>based products will operate for this duration as some sites may not make products that contain PCE every day while others may operate more than 300 days/yr based on product demand and process needs. Therefore, the average daily discharges may be higher if sites operate for fewer than 300 days/yr or lower if they operate for greater than 300 days/yr. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, and the uncertainties in the number of sites and daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates.</p>
Batch Open-Top Vapor Degreasing	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 TRI and the 2016 DMR. TRI and DMR data were determined to have a “medium” data quality rating through EPA’s systematic review process. Specifically, the TRI and DMR data were scored high for representativeness of geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of medium. The “low” scores are a result of the information available in each data source. For example, neither TRI nor DMR include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> Due to reporting requirements for TRI and DMR, EPA does not expect all sites using PCE in OTVD to be captured in the databases. It is uncertain the extent that sites not captured in these databases discharge wastewater containing PCE and whether any such discharges would be to surface water, POTW, or non-POTW WWT; however, the sites may be required to comply with an EG depending on the industry in which the OTVD is being used. Additionally, information on the conditions of use of PCE at facilities in TRI and DMR is limited; therefore, there is some uncertainty as to whether all of the sites assessed in this section are using PCE in OTVD rather than a different condition of use (including other vapor degreasing and cold cleaning operations and use of PCE in metalworking fluids). If the sites were categorized under a different OES, the annual wastewater discharges for each site would remain unchanged; however, average daily discharges may change depending on the number of operating days expected for the OES.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to TRI and DMR only report annual discharges; to assess daily discharges, EPA assumed 260 days/yr of operation and averaged the annual discharges over the operating days. There is some uncertainty that all sites using PCE in OTVDs will operate for this duration as some sites may use degreasing equipment more or less frequently than 260 days/yr depending on process demands. Therefore, the average daily discharges may be higher if sites operate for fewer than 260 days/yr or lower if they operate for greater than</p>

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
	<p>260 days/yr. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, and the uncertainties in the number of sites and daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates.</p>
Batch Closed-Loop Vapor Degreasing	Same as the Open-Top Vapor Degreasing (OTVD) OES.
Conveyorized Vapor Degreasing	Same as the Open-Top Vapor Degreasing (OTVD) OES.
Web Degreasing	Same as the Open-Top Vapor Degreasing (OTVD) OES.
Cold Cleaning	Same as the Open-Top Vapor Degreasing (OTVD) OES.
Aerosol Degreasing and Aerosol Lubricants	<p>EPA assessed no wastewater discharges for this OES. There is some uncertainty as to whether and how much PCE may deposit on shop floors. However, due to the volatility of PCE, EPA expects PCE to evaporate from any such deposit prior to it being discharged; thus, limiting any potential discharges to surface water, POTW, or non-POTW WWT from this source. Based on this information, EPA has a high confidence in the release assessment.</p>
Dry Cleaning and Spot Cleaning	<p><b>Data Quality Ratings:</b> Wastewater discharges from industrial launderers are assessed using reported discharges from the 2016 DMR. DMR data were determined to have a “medium” data quality rating through EPA’s systematic review process. The “low” scores are a result of the information available in DMR. For example, DMR does not include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Limitations to Release Data for Industrial Launderer:</b> DMR does not contain data for 4 of the 12 industrial launderer sites. These four sites may not be in DMR because they may have no water discharges or because they discharge to sewer rather than surface water (sewer discharges not reported in DMR).</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to DMR only report annual discharges; to assess daily discharges, EPA assumed annual days of operation and averaged the annual discharges over the operating days. There is some uncertainty that all industrial launderers using PCE will operate for this duration as site-specific demands may result in higher or lower operating days. Therefore, the average daily discharges may be higher if sites operate for fewer than the operating days or lower if they operate for greater than the operating days. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge. Based on this information, EPA has a medium confidence in the wastewater discharge estimates at industrial launderers.</p>



Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
	<p><b>Strengths of the Release Model for Small Commercial Dry Cleaners:</b> Wastewater discharges from small commercial dry cleaners is assessed using the Solvent Release in Water Discharge from Dry Cleaning Machines Model. The model is based on the <i>EPA/OPPT Water Saturation Loss Model</i>, which assumes that water contacted with the chemical becomes saturated with the chemical and remains saturated at the time of disposal. The primary difference between this model and the <i>EPA/OPPT Water Saturation Model</i> is this model calculates the amount of produced wastewater using data (and distributions, where available) obtained from literature for the volume of water produced water per pound of clothes cleaned, load size, and loads per day. Using these parameters and distributions the model is able to capture variability in the amount of produced wastewater at dry cleaners.</p> <p><b>Uncertainties in the Release Model for Small Commercial Dry Cleaners:</b> There is some uncertainty on how sites will dispose of water containing-PCE and some states may regulate the disposal; therefore, not all sites are expected to discharge wastewater to POTW.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, the limitations to the release data, and the uncertainties in the daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates at industrial launderers. Based on the strengths and uncertainties of the model, EPA has a medium level of confidence in the wastewater discharge estimates at small commercial dry cleaners.</p>
Adhesives, Sealants, Paints, and Coatings	<p><b>Uncertainties in the Release Model:</b> Wastewater discharges from adhesive, sealant, coating, and paint applications are assessed using loss fractions from ESDs and the EPA/OPPT Automobile OEM (Original Equipment Manufacturer) Coating Overspray Loss Model. These approaches represent release estimates for the solids (i.e., non-volatile) portions of the coatings or adhesives and do not account for potential evaporation of volatiles from the mist prior to entering wastewater. Therefore, these estimates likely overestimate actual wastewater discharges of PCE due to volatilization (PCE vapor pressure is 18.5 mmHg at 25°C). This evaporation is difficult to estimate and is not considered in this assessment.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> There is further uncertainty that the number of sites obtained from the 2014 NEI represent the total number of sites using adhesives or coatings containing PCE. NEI data only covers specific industries which may not capture the entirety of industries using these products. NEI also does not include operations that are classified as area sources because area sources are reported at the county level and do not include site-specific information. It is uncertain the extent that sites not captured in this assessment discharge wastewater containing PCE and whether any such discharges would be to surface water, POTW, or non-POTW WWT.</p> <p><b>Overall Confidence Rating:</b> Based on the uncertainties in the release model and number of sites, EPA has a medium confidence in the wastewater discharge estimates.</p>

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
Maskant for Chemical Milling	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 TRI and the 2016 DMR. TRI and DMR data were determined to have a “medium” data quality rating through EPA’s systematic review process. Specifically, the TRI and DMR data were scored high for representativeness of geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of medium. The “low” scores are a result of the information available in each data source. For example, neither TRI nor DMR include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> The discharges in TRI and DMR do not include 44 of the expected 71 sites that use PCE-based maskants. It is uncertain the extent that sites not captured in these databases discharge wastewater containing PCE and whether any such discharges would be to surface water, POTW, or non-POTW WWT; however, the sites may be required to comply with the Metal Finishing EG. Additionally, information on the conditions of use of PCE at facilities in TRI and DMR is limited; therefore, there is some uncertainty as to whether all of the sites assessed in this section are performing maskant operations rather than a different condition of use. If the sites were categorized under a different OES, the annual wastewater discharges for each site would remain unchanged; however, average daily discharges may change depending on the number of operating days expected for the OES.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to TRI and DMR only report annual discharges; to assess daily discharges, EPA used site-specific reported operating time from the 2014 NEI, where available, or assumed 172 days/yr of operation (based on the average operating time from the 2014 NEI) and averaged the annual discharges over the operating days. There is some uncertainty that all sites using PCE-based maskants will operate for this duration as, based on process needs, some sites may perform masking activities more or less frequently than the average days/yr from NEI or use other maskants not containing PCE for certain operations. Therefore, the average daily discharges may be higher if sites operate for fewer than the estimated operating days or lower if they operate for greater than the estimated operating days. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, and the uncertainties in the number of sites and daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates.</p>
Industrial Processing Aid	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 TRI and the 2016 DMR. TRI and DMR data were determined to have a “medium” data quality rating through EPA’s</p>

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
	<p>systematic review process. Specifically, the TRI and DMR data were scored high for representativeness of geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of medium. The “low” scores are a result of the information available in each data source. For example, neither TRI nor DMR include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> Due to reporting requirements for TRI and DMR, the number of sites in this OES may be underestimated. It is uncertain the extent that sites not captured in these databases discharge wastewater containing PCE and whether any such discharges would be to surface water, POTW, or non-POTW WWT. Additionally, information on the conditions of use of PCE at facilities in TRI and DMR is limited; therefore, there is some uncertainty as to whether all of the sites assessed in this section are using PCE as a processing aid rather than a different condition of use. If the sites were categorized under a different OES, the annual wastewater discharges for each site would remain unchanged; however, average daily discharges may change depending on the number of operating days expected for the OES.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to TRI and DMR only report annual discharges; to assess daily discharges, EPA assumed 300 days/yr of operation and averaged the annual discharges over the operating days. There is some uncertainty that all sites using PCE as a processing aid will operate for this duration as some sites may use PCE processing aids more or less frequently than 300 days/yr based on process needs. Therefore, the average daily discharges may be higher if sites operate for fewer than 300 days/yr or lower if they operate for greater than 300 days/yr. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, and the uncertainties in the number of sites and daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates.</p>
Metalworking Fluids	Same as the Open-Top Vapor Degreasing (OTVD) OES.
Wipe Cleaning and Metal/Stone Polishes	EPA assessed no wastewater discharges for this OES. There is some uncertainty as to whether and how much PCE may drip from the rag/cloth or the substrate surface onto shop floors or ground (for outdoor applications). However, due to the volatility of PCE, EPA expects PCE to evaporate from any such deposit prior to it being discharged; thus, limiting any potential discharges to surface water, POTW, or non-POTW WWT from this source. Based on this information, EPA has a high confidence in the release assessment.

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	No information identified to estimate wastewater discharges from this OES.
Other Industrial Uses	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 TRI and the 2016 DMR. TRI and DMR data were determined to have a “medium” data quality rating through EPA’s systematic review process. Specifically, the TRI and DMR data were scored high for representativeness of geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of medium. The “low” scores are a result of the information available in each data source. For example, neither TRI nor DMR include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> Due to reporting requirements for TRI and DMR, the number of sites in this OES may be underestimated. It is uncertain the extent that sites not captured in these databases discharge wastewater containing PCE and whether any such discharges would be to surface water, POTW, or non-POTW WWT. Additionally, information on the conditions of use of PCE at facilities in TRI and DMR is limited; therefore, there is some uncertainty as to whether all of the sites assessed in this section are performing other industrial uses rather than a different condition of use. If the sites were categorized under a different OES, the annual wastewater discharges for each site would remain unchanged; however, average daily discharges may change depending on the number of operating days expected for the OES.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to TRI and DMR only report annual discharges; to assess daily discharges, EPA assumed 250 days/yr of operation and averaged the annual discharges over the operating days. There is some uncertainty that all sites using PCE for other industrial uses will operate for this duration as some sites may use PCE more or less frequently than 250 days/yr based on process needs. Therefore, the average daily discharges may be higher if sites operate for fewer than 250 days/yr or lower if they operate for greater than 250 days/yr. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, and the uncertainties in the number of sites and daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates.</p>
Other Commercial Uses	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 DMR. DMR data were determined to have a “medium” data quality rating through EPA’s systematic review process. Specifically, the DMR data were scored high for representativeness of</p>

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
	<p>geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of medium. The “low” scores are a result of the information available in DMR. For example, DMR does not include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> Due to reporting requirements for DMR, these sites are not expected to capture the entirety of water releases from this OES. It is uncertain the extent that sites not captured in DMR discharge wastewater containing PCE and whether any such discharges would be to surface water, POTW, or non-POTW WWT. Additionally, information on the conditions of use of PCE at facilities in DMR is limited; therefore, there is some uncertainty as to whether all of the sites assessed in this section are performing other commercial uses rather than a different condition of use. If the sites were categorized under a different OES, the annual wastewater discharges for each site would remain unchanged; however, average daily discharges may change depending on the number of operating days expected for the OES.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to DMR only report annual discharges; to assess daily discharges, EPA assumed 250 days/yr of operation and averaged the annual discharges over the operating days. There is some uncertainty that all sites using PCE in other commercial uses will operate for this duration as some sites may use PCE more or less frequently than 250 days/yr based on process needs. Therefore, the average daily discharges may be higher if sites operate for fewer than 250 days/yr or lower if they operate for greater than 250 days/yr. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, and the uncertainties in the number of sites and daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates.</p>
Laboratory Chemicals	No information identified to estimate wastewater discharges from this OES.
Waste Handling, Disposal, Treatment, and Recycling	<p><b>Data Quality Ratings:</b> Wastewater discharges are assessed using reported discharges from the 2016 TRI and the 2016 DMR. TRI and DMR data were determined to have a “medium” data quality rating through EPA’s systematic review process. Specifically, the TRI and DMR data were scored high for representativeness of geographic scope, applicability, and temporal representativeness but scored low for methodology, accessibility/clarity, and variability/uncertainty resulting in an overall quality of medium. The “low” scores are a result of the information available in each data source. For example, neither TRI nor DMR include: data on how each reporter estimated their releases (methodology); metadata (e.g., release frequency, process/unit operation that is the source of the release) other than the media</p>

Occupational Exposure Scenario (OES)	Assumptions, Uncertainty, and Overall Confidence in Release Estimates
	<p>of release (accessibility/clarity); or address variability/uncertainty in the reported estimates.</p> <p><b>Uncertainties in Number of Sites Estimate:</b> Due to reporting requirements for TRI and DMR, the number of sites in this OES may be underestimated. It is uncertain the extent that sites not captured in these databases discharge wastewater containing PCE and whether any such discharges would be to surface water, POTW, or non-POTW WWT. Additionally, information on the conditions of use of PCE at facilities in TRI and DMR is limited; therefore, there is some uncertainty as to whether all of the sites assessed in this section are performing waste treatment, disposal, and recycling activities rather than a different condition of use. If the sites were categorized under a different OES, the annual wastewater discharges for each site would remain unchanged; however, average daily discharges may change depending on the number of operating days expected for the OES.</p> <p><b>Uncertainties in the Daily Discharge Estimates:</b> Facilities reporting to TRI and DMR only report annual discharges; to assess daily discharges, EPA assumed 250 days/yr of operation and averaged the annual discharges over the operating days. There is some uncertainty that all sites disposing/treating/recycling wastes containing PCE will operate for this duration as some sites may receive/treat PCE-containing wastes more or less frequently than 250 days/yr based on customer demands. Therefore, the average daily discharges may be higher if sites operate for fewer than 250 days/yr or lower if they operate for greater than 250 days/yr. Furthermore, PCE concentrations in wastewater discharges at each site may vary from day-to-day such that on any given day the actual daily discharges may be higher or lower than the estimated average daily discharge.</p> <p><b>Overall Confidence Rating:</b> Based on the data quality score, and the uncertainties in the number of sites and daily discharge estimates, EPA has a medium confidence in the wastewater discharge estimates.</p>
Other Department of Defense Uses	No information identified to estimate wastewater discharges from this OES.

1951

1952 **2.3 Environmental Exposures Overview**

1953 The manufacturing, processing, use and disposal of PCE can result in releases to the  
 1954 environment. In this section, EPA presents what approach and methodology was used to evaluate  
 1955 PCE exposures to aquatic organisms via surface water. The environmental exposure  
 1956 characterization focuses on aquatic releases of PCE from facilities that use, manufacture, or  
 1957 process PCE under industrial and/or commercial conditions of use subject to TSCA regulations.  
 1958

1959 To characterize environmental exposure, EPA identified and reviewed national scale monitoring  
 1960 data. Measured surface water concentrations were obtained from EPA’s Water Quality Exchange  
 1961 (WQX) using the online Water Quality Portal (WQP) tool, which is the nation’s largest source of  
 1962 water quality monitoring data and includes results from EPA’s STORage and RETrieval  
 1963 (STORET) Data Warehouse, the United States Geological Survey (USGS), National Water  
 1964 Information System (NWIS), and other federal, state, and tribal sources. A full systematic review

1965 of reasonably available surface water literature was also conducted to identify other peer-  
1966 reviewed or grey literature<sup>7</sup> sources of measured surface water concentrations in the US. Point  
1967 estimate exposures were derived from both measured and predicted concentrations of PCE in  
1968 surface water in the United States. Predicted surface water concentrations were modeled for  
1969 facility releases in the EPA Lifecycle Release Analysis conducted for reporting year 2016, as  
1970 determined from EPA's Toxics Release Inventory (TRI), Discharge Monitoring Reports (DMR;  
1971 through EPA's Water Pollutant Loading Tool), and EPA's Chemical Data Reporting (CDR).

1972  
1973 The aquatic modeling was conducted with EPA's Exposure and Fate Assessment Screening  
1974 Tool, version 2014 (E-FAST 2014) ([U.S. EPA 2014b](#)), using reported annual release/loading  
1975 amounts (kg/yr) and estimates of the number of days per year that the annual load is released. As  
1976 appropriate, two scenarios were modeled per release: release of the annual load over an  
1977 estimated maximum number of operating days per year and over only 20 days per year. Twenty  
1978 days of release was modeled as the low-end release frequency at which possible ecologic chronic  
1979 risk could be determined. Additionally, the Probabilistic Dilution Model (PDM), a module of E-  
1980 FAST 2014 was run to estimate the number of days a stream concentration will exceed the  
1981 designated concentration of concern (COC) value.

1982  
1983 The measured concentrations reflect localized ambient exposures at the monitoring sites, and the  
1984 modeled concentrations reflect near-site estimates at the point of release. A geospatial analysis at  
1985 the watershed level (HUC-8 and HUC-12; Hydrologic Unit Codes) was conducted to compare  
1986 the measured and predicted surface water concentrations and investigate if the facility releases  
1987 may be associated with the observed concentrations in surface water. Hydrologic Unit Codes  
1988 (HUCs) are a geographically hierarchical tiered approach to organizing stream networks across  
1989 the United States from regions to sub water sheds and part of the Watershed Boundary Dataset  
1990 developed by U.S. Geological Survey and U.S. Department of Agriculture ([USGS 2013](#)). HUC-8  
1991 and HUC-12 sized units were selected as they were expected to give a representative geographic  
1992 size range over which predicted surface water concentrations would be relevant to measured  
1993 concentrations.

1994

### 1995 **2.3.1 Aquatic Exposure Modeling Approach**

1996 Surface water concentrations resulting from wastewater releases of PCE from facilities that use,  
1997 manufacture, or process PCE related to TSCA conditions of use were modeled using EPA's  
1998 Exposure and Fate Assessment Screening Tool, Version 2014 ([U.S. EPA 2014b](#)). E-FAST 2014  
1999 is a model that estimates chemical concentrations in water to which aquatic life may be exposed  
2000 using upper percentile and/or mean exposure parametric values, resulting in high-end exposure  
2001 estimates. Other assumptions and uncertainties in the model, including ways it may be  
2002 underestimating or overestimating exposure, are discussed in the Sections 4.3.1. Advantages to  
2003 this model are that it requires minimal input parameters and it has undergone extensive peer  
2004 review by experts outside of EPA. A brief description of the calculations performed within the

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<sup>7</sup> Grey literature refers to sources of scientific information that are not formally published and distributed in peer reviewed journal articles. These references are still valuable and consulted in the TSCA risk evaluation process. Examples of grey literature are theses and dissertations, technical reports, guideline studies, conference proceedings, publicly-available industry reports, unpublished industry data, trade association resources, and government reports. ([U.S. EPA 2018c](#))

2005 tool, as well as a description of required inputs and the methodology to obtaining and using  
2006 inputs specific to this assessment is described below. To obtain more detailed information on the  
2007 E-FAST 2014 tool from the user guide/background document (U.S. EPA 2014b), as well as to  
2008 download the tool, visit this web address: [https://www.epa.gov/tsca-screening-tools/e-fast-](https://www.epa.gov/tsca-screening-tools/e-fast-exposure-and-fate-assessment-screening-tool-version-2014/)  
2009 [exposure-and-fate-assessment-screening-tool-version-2014/](https://www.epa.gov/tsca-screening-tools/e-fast-exposure-and-fate-assessment-screening-tool-version-2014/). All model runs for this assessment  
2010 were conducted between December 2018 and June 2019.  
2011

2012 **2.3.1.1 Exposure and Fate Assessment Screening (E-FAST) Tool 2014 Inputs**  
2013 Individual model inputs and accompanying considerations for the surface water modeling for E-  
2014 Fast 2014 (U.S. EPA 2014b) are discussed in the following sections.  
2015

2016 **2.3.1.1.1 Chemical release to wastewater (WWR)**

2017 Annual wastewater loading estimates (kg/site/year or lb/site/year) were obtained from TRI, the Water  
2018 Pollutant Loading Tool, or CDR in the year 2016, as discussed in the lifecycle assessment in Section  
2019 2.2.1.1. To model these releases within E-FAST 2014 (U.S. EPA 2014b), the annual release is  
2020 converted to a daily release using an estimated days of release per year. Below is an example  
2021 calculation:  
2022

2023 
$$\text{WWR (kg/day)} = \text{Annual loading (kg/site/year)} * \text{Days released per year (days/year)} \quad (\text{Eq. 2-3})$$
  
2024

2025 In cases where the total annual release amount from one facility was discharged via multiple  
2026 mechanisms (i.e., direct to surface water and/or indirectly through one or more WWTPs), the annual  
2027 release amount was divided accordingly based on reported information in TRI (Form R).  
2028

2029 **2.3.1.1.2 Release Days (days/year)**

2030 The number of days per year that the chemical is discharged is used to calculate a daily release amount  
2031 from annual loading estimates (see above). Current regulations do not require facilities to report the  
2032 number of days associated with reported releases. Therefore, two release scenarios were modeled for  
2033 direct discharging facilities to provide upper and lower bounds for the range of surface water  
2034 concentrations predicted by E-FAST 2014 (U.S. EPA 2014b). The two scenarios modeled are a  
2035 maximum release frequency (200 to 365 days) based on estimates specific to the facility's condition of  
2036 use and a low-end release frequency of 20 days of release per year. The 20-day chronic risk criterion is  
2037 derived from partial life cycle tests (e.g., daphnid chronic and fish early life stage tests) that typically  
2038 range from 21 to 28 days in duration. For indirect dischargers, only the maximum estimated days of  
2039 release per year was modeled because it was assumed that the actual release to surface water would  
2040 occur at receiving WWTPs which typically operate every day of the year.  
2041

2042 **2.3.1.1.3 Removal from wastewater treatment (WWT%)**

2043 The WWT% is the percentage of the chemical removed from wastewater during treatment before  
2044 discharge to a body of water. As discussed in Section 2.1.2, Summary of Fate and Transport, the  
2045 WWT% for PCE was estimated as 80% using the "STP" module within The EPI Suite™, which  
2046 was run using default settings to evaluate the potential for PCE to volatilize to air or adsorb to  
2047 sludge during wastewater treatment. However, E-FAST does not consider volatilization of PCE



2048 therefore the removal percentage of 80% was slightly lower than what EPI suites estimated at  
2049 88%. EPA took a more conservative approach in the estimated removal of PCE using the E-  
2050 FAST model. The WWT% of 80% was applied to releases from indirect discharging facilities  
2051 because the releases are transferred off-site for treatment at a WWTP prior to discharge to  
2052 surface water. Direct discharging facilities that release PCE to surface water is not treated prior  
2053 to discharge, therefore EPA does not account for removal of PCE. If not enough release  
2054 information was available to determine if the release was direct or indirect, then E-FAST 2014  
2055 ([U.S. EPA 2014b](#)) was run with and without the WWT%. These releases are typically those  
2056 identified through the OCSPF EGL data source and are from facilities that are not in DMR or  
2057 TRI.  
2058

#### 2059 **2.3.1.1.4 Facility or Industry Sector**

2060 The required site-specific stream flow or dilution factor information is contained in the E-FAST  
2061 2014 database ([U.S. EPA 2014b](#)), which is accessed by querying a facility National Pollutant  
2062 Discharge Elimination System (NPDES) number, name, or reach code. For facilities that directly  
2063 discharge to surface water (i.e., “direct dischargers”), the NPDES of the direct discharger was selected  
2064 from the database. For facilities that indirectly discharge to surface water (i.e., “indirect dischargers”  
2065 because the release is sent to a waste-water treatment plant (WWTP) prior to discharge to surface water),  
2066 the NPDES of the receiving WWTP was selected. The receiving facility name and location was  
2067 obtained from the TRI database (Form R), if available. As TRI does not contain the NPDES of receiving  
2068 facilities, the NPDES was obtained using EPA’s Envirofacts search tool  
2069 (<https://www3.epa.gov/enviro/facts/multisystem.html>, ([U.S. EPA 2019d](#))). If a facility NPDES was not  
2070 available in the E-FAST-2014 database ([U.S. EPA 2014b](#)), the release was modeled using water body  
2071 data for a surrogate NPDES (preferred) or an industry sector, as described below.  
2072

##### 2073 **2.3.3.1.4.1 Surrogate NPDES**

2074 In cases where the site-specific NPDES was not available in the E-FAST 2014 database ([U.S.](#)  
2075 [EPA 2014b](#)), the preferred alternative was to select the NPDES for a nearby facility that  
2076 discharges to the same waterbody. Nearby facilities were identified using the Chemical Safety  
2077 Mapper within IGEMS and/or search of the E-FAST 2014 database ([U.S. EPA 2014b](#)) by reach  
2078 code.  
2079

##### 2080 **2.3.3.1.4.2 Industry Sector (SIC Code Option)**

2081 If the NPDES is unknown, no close analog could be identified, or the exact location of a  
2082 chemical loading is unknown, surface water concentrations were modeled using the “SIC Code  
2083 Option” within E-FAST 2014 ([U.S. EPA 2014b](#)). This option uses the 10<sup>th</sup> and 50<sup>th</sup> percentile  
2084 receiving 7Q10 stream flows for dischargers in a given industry sector, as defined by the  
2085 Standard Industrial Classification (SIC) codes of the industry. The industrial sectors for each  
2086 condition of use category can be found in 5.3.68Appendix D.  
2087

2088

**2.3.1.2 E-FAST 2014 Equations**

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2089

**2.3.1.2.1 Surface Water Concentrations**

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2090

EPA used E-FAST 2014 ([U.S. EPA 2014b](#)) estimate site-specific surface water concentrations for discharges to both free-flowing water bodies (i.e., rivers and streams) and for still water bodies (i.e., bays, lakes, and estuaries).

2093

2094

For free-flowing water body assessments, E-FAST 2014 ([U.S. EPA 2014b](#)) calculates surface water concentrations for four streamflow conditions (7Q10, harmonic mean, 30Q5, and 1Q10 flows) using the following equation:

2096

2097

$$SWC = \frac{WWR \times CF1 \times \left(1 - \frac{WWT}{100}\right)}{SF \times CF2} \quad (\text{Eq. 2-1})$$

2098

2099

where:

2100

SWC = Surface water concentration (parts per billion (ppb) or µg/L)

2101

WWR = Chemical release to wastewater (kg/day)

2102

WWT = Removal from wastewater treatment (%)

2103

SF = Estimated flow of the receiving stream (MLD, Million Liters per Day)

2104

2105

CF1 = Conversion factor (10<sup>9</sup> µg/kg)

2106

CF2 = Conversion factor (10<sup>6</sup> L/day/MLD)

2107

2108

For still water body assessments, no simple streamflow value represents dilution in these types of water bodies. As such, E-FAST 2014 ([U.S. EPA 2014b](#)) accounts for dilution by incorporating an acute or chronic dilution factor for the water body of interest instead of stream flows. Dilution factors in E-FAST 2014 ([U.S. EPA 2014b](#)) are typically 1 (representing no dilution) to 200, based on NPDES permits or regulatory policy. The following equation is used to calculate surface water concentrations in still water bodies:

2109

2110

2111

2112

2113

2114

$$SWC = \frac{WWR \times \left(1 - \frac{WWT}{100}\right) \times CF1}{PF \times CF2 \times DF} \quad (\text{Eq. 2-2})$$

2115

2116

where:

2117

SWC = Surface water concentration (ppb or µg/L)

2118

WWR = Chemical release to wastewater (kg/day)

2119

WWT = Removal from wastewater treatment (%)

2120

PF = Effluent flow of the discharging facility (MLD)

2121

DF = Acute or chronic dilution factor used for the water body (typically between 1 and 200)

2122

2123

CF1 = Conversion factor (10<sup>9</sup> µg/kg)

2124

CF2 = Conversion factor (10<sup>6</sup> L/day/MLD)

2125

2126

**2.3.1.2.2 Days of COC Exceedance**

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2127

The Probabilistic Dilution Model (PDM) portion of E-FAST 2014 ([U.S. EPA 2014b](#)) was also run for free-flowing water bodies, which predicts the number of days per year a chemical's concentration of concern (COC) in an ambient water body will be exceeded. The model is based

2128

2129

2130 on a simple mass balance approach presented by ([Di Toro 1984](#)) that uses probability  
2131 distributions as inputs to reflect that streams follow a highly variable seasonal flow pattern and  
2132 there are numerous variables in a manufacturing process can affect the chemical concentration  
2133 and flow rate of the effluent. PDM does not estimate exceedances for chemicals discharged to  
2134 still waters, such as lakes, bays, or estuaries. For these water bodies, the days of exceedance is  
2135 assumed be zero unless the predicted surface water concentration exceeds the COC. In these  
2136 cases, the days of exceedance is set to the number of release days per year (see required inputs  
2137 below).  
2138

### 2139 **2.3.1.3 E-FAST 2014 Outputs**

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2140 There are two main results generated from E-FAST ([U.S. EPA 2014b](#)) that EPA used in  
2141 characterizing environmental exposures: surface water concentration estimates, and the number of  
2142 days a certain surface water concentration was exceeded. Site-specific surface water concentration  
2143 estimates for free-flowing water bodies are reported for both the 7Q10 and harmonic mean stream  
2144 flows. The 7Q10 stream flow is the lowest consecutive 7-day average flow during any 10-year  
2145 period. The harmonic mean stream flow, a less conservative value, is the inverse mean of  
2146 reciprocal daily arithmetic mean flow values. Site-specific surface water concentration estimates  
2147 for still water bodies are reported for calculations using the acute dilution factors. In cases where  
2148 site-specific flow/dilution data were not available, the releases were modeled using stream flows  
2149 of a representative industry sector, as calculated from all facilities assigned to the industry sector  
2150 in the E-FAST database ([U.S. EPA 2014b](#)) (discussed below). Estimates from this calculation  
2151 method are reported for the 10<sup>th</sup> percentile harmonic mean and 10<sup>th</sup> percentile 7Q10 stream flows.  
2152

### 2153 **2.3.2 Surface Water Monitoring Data Gathering Approach**

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2154 To characterize environmental exposure in ambient water for PCE, EPA used two approaches to  
2155 obtain measured surface water concentrations. One approach was to conduct a search of  
2156 published literature for surface water concentrations in peer reviewed journals and the second  
2157 was to pull monitoring data on surface water concentrations from the WQP.  
2158

#### 2159 **2.3.2.1 Method for Systematic Review of Surface Water Monitoring Data**

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2160 EPA conducted a review of published literature to identify studies reporting concentrations of  
2161 PCE in surface water associated with background levels of contamination or potential releases  
2162 from facilities that manufacture, process, use and/or dispose of PCE in the United States. Studies  
2163 clearly associated with releases from Superfund sites, improper disposal methods, and landfills  
2164 were considered off-PECO and excluded from data evaluation and extraction. The systematic  
2165 review process is described in detail in Section 1.5. A total of 26 surface water studies were  
2166 extracted and the results are summarized in Section 2.3.4.2.3. A total of 3 U.S. surface water  
2167 studies were extracted and the results are summarized in Section 2.3.4.2.3  
2168

#### 2169 **2.3.2.2 Method for Obtaining Surface Water Monitoring Data from** 2170 **WQX/WQP**

---

2171 The primary source for the occurrence of PCE in surface water is monitoring data retrieved from  
2172 the Water Quality Portal (WQP), which integrates publicly available U.S. water quality data

2173 from multiple databases: 1) USGS NWIS, 2) STORET, and 3) the USDA ARS Sustaining The  
2174 Earth's Watersheds - Agricultural Research Database System (STEWARDS). For PCE the data  
2175 retrieved originated from the NWIS and STORET databases. NWIS is the Nation's principal  
2176 repository of water resources data USGS collects from over 1.5 million sites, including sites  
2177 from the National Water-Quality Assessment (NAWQA). STORET refers to an electronic data  
2178 system originally created by EPA in the 1960s to compile water quality monitoring data. NWIS  
2179 and STORET now use common web services, allowing data to be published through WQP tool.  
2180 The WQP tool and User Guide is accessed from the following website:  
2181 (<http://www.waterqualitydata.us/portal.jsp>, (Nwqmc 2017))  
2182

#### 2183 **2.3.2.2.1 Data Retrieval from WQP**

2184 Surface water data for PCE were downloaded from the WQP ([Nwqmc 2017](#)) on October 3, 2018.  
2185 The WQP can be searched through three different search options: Location Parameters, Site  
2186 Parameters, and Sampling Parameters. The PCE data were queried through the Sampling  
2187 Parameters search using the Characteristics parameter (selected "Tetrachloroethene (NWIS,  
2188 STORET)") and Date Range parameter (selected "01-01-2008 to 12-31-2017"). Both the "Site  
2189 data only" and "Sample results (physical/chemical metadata)" were selected for download in  
2190 "MS Excel 2007+" format. The "Site data only" file contains monitoring site information (i.e.,  
2191 location in hydrologic cycle, HUC and geographic coordinates); whereas the "Sample result" file  
2192 contains the sample collection data and analytical results for individual samples. An example of  
2193 WQP search option is shown below in Figure 2-3.

2194

2195 **Figure 2-3.** WQP Search Option. Surface water data were obtained from the WQP by querying  
 2196 the Sampling Parameters search option for the characteristic (STORET data), Parameter Code  
 2197 (NWIS data), and date range parameter.

2198 **2.3.2.2.2 Data Filtering and Cleansing**

2199 The “Site data only” and “Sample results (physical/chemical metadata)” files were linked  
 2200 together using the common field “Monitoring Location Identifier” and then filtered and cleansed  
 2201 to obtain surface water samples for years 2013 through 2017. Specifically, cleansing focused on  
 2202 obtaining samples were only for the media of interest (i.e., surface water), were not quality  
 2203 control samples (i.e., field blanks), were of high analytical quality (i.e., no quality control issues,  
 2204 sample contamination, or estimated values), and were not associated with contaminated sites  
 2205 (i.e., Superfund).

2206 The following filtering to obtain the final dataset, the domains were examined to identify  
 2207 samples with non-detect concentrations. All non-detect samples were tagged and the  
 2208 concentrations were converted to ½ the reported detection limit for summary calculation  
 2209 purposes. If a detection limit was not provided, calculations were performed using the average of  
 2210 the reported detection limits in all samples (calculated as 0.3 µg/L).

2211 **2.3.3 Geospatial Analysis Approach**

2212 Using 2016 data, the measured surface water concentrations from the WQP and predicted  
 2213 concentrations from the modeled facility releases were mapped in ArcGIS to conduct a  
 2214 watershed analysis at the HUC 8 and HUC 12 level. The purpose of the analysis was to identify  
 2215 if any the observed surface water concentrations could be attributable to the modeled facility  
 2216 releases. In addition, the analysis included a search for Superfund sites within 1 to 5 miles of the

2217 surface water monitoring stations to possible exclude these monitoring sites from the analysis. A  
2218 U.S. scale map was developed to provide a spatial representation of the measured and predicted  
2219 concentrations. HUCs with co-located monitoring stations and facility releases were identified  
2220 and examined further. Maps were developed on a U.S. scale to provide a spatial display of the  
2221 concentrations, as well as at the HUC scale to focus on co-located monitoring stations and  
2222 facility releases.

2223

2224

### **2.3.3.1 Geographic Coordinates**

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2225 The location of the monitoring stations was determined from the geographic coordinates (latitude  
2226 and longitude) provided in WQP. Releases from facilities were located based on the geographic  
2227 coordinates for the NPDES, TRI, and/or FRS of the mapped facility, as provided by FRS. For  
2228 indirect dischargers, the location of the receiving facility was mapped if known. If not known,  
2229 the location of the indirect discharger was mapped. Superfund sites in 2016 were identified and  
2230 mapped using geographic coordinates of the “front door”, as reported in the Superfund  
2231 Enterprise Management System (SEMS) database in Envirofacts, ([U.S. EPA 2014d](#)).

2232

### **2.3.4 Environmental Exposure Results**

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2233 In the section below, EPA summarizes what was identified in the evaluation of PCE in surface  
2234 water. To determine what potential PCE occurrence there is in surface water, EPA evaluated  
2235 both measured and modeled data using various approaches and methods. In the evaluation of  
2236 PCE there are certain limitations that need to be accounted for when interpreting PCE exposure  
2237 in the environment.

2238

#### **2.3.4.1 Aquatic Environmental Exposures**

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2239

##### **2.3.4.1.1 Predicted Surface Water Concentrations: E-FAST 2014 Modeling**

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2240 A summary of the surface water concentration estimates modeled using E-FAST 2014 ([U.S.](#)  
2241 [EPA 2014b](#)), based on the lifecycle release analysis for the year 2016, is summarized by OES  
2242 category in Table 2-6 through Table 2-8. For the maximum release scenario (200-365 days of  
2243 release/year), surface water concentrations under 7Q10 flow conditions ranged from 9.6E-09 to  
2244 135 ppb (Table 2-6). For the 20 days of release/year scenario for direct dischargers, surface  
2245 water concentrations under 7Q10 flow conditions ranged from 4.0E-06 to 397 ppb (Table 2-7).  
2246 For comparison purposes, indirect releases to non-POTW WWTPs were also modeled for the 20  
2247 days of release/year scenario, resulting in surface water concentrations of 1.0E-02 to 2034 ppb  
2248 (Table 2-8). On a per facility basis, the 20 day release scenario yielded higher surface water  
2249 concentrations than the maximum days of release scenario.

2250

2251 Reported loadings were used to model surface water concentrations with E-FAST 2014 ([U.S.](#)  
2252 [EPA 2014b](#)). E-FAST was run using no further removal for wastewater treatment, this is  
2253 appropriate for direct release DMR data because DMRs are “submitted from facilities that have  
2254 NPDES permitted outfalls (which in most cases are discharges to surface waters)”  
2255 (<https://echo.epa.gov/trends/loading-tool/resources/faq>), and the top indirect dischargers were  
2256 themselves wastewater treatment facilities, reporting post-treatment release to surface water. TRI  
2257 reporting facilities must identify the name of water body (or receiving POTW) into which the  
2258 TRI chemical is being discharged. ([https://www.epa.gov/toxics-release-inventory-tri-](https://www.epa.gov/toxics-release-inventory-tri-program/descriptions-tri-data-terms-text-version)  
2259 [program/descriptions-tri-data-terms-text-version](https://www.epa.gov/toxics-release-inventory-tri-program/descriptions-tri-data-terms-text-version), ([U.S. EPA 2020m](#))) data may be transferred  
2260 through pipes or sewers to POTWs (18/24 top releasers identified as release to surface water,

2261 others were assumed to be surface water releases, using SIC code) National Pollutant Discharge  
 2262 Elimination System (NPDES) permit codes were used to identify reach and flow characteristics  
 2263 for discharges. If a NPDES code was not identified, the most applicable SIC (Standard Industrial  
 2264 Classification) code was used. Surface water estimates were generated assuming an acute  
 2265 scenario of a single day release, and chronic scenarios of 20 and 250 days of release. Wastewater  
 2266 treatment plants and water pollution control plants were only assessed for chronic scenarios (20  
 2267 and 250 days of release).  
 2268

2269 **Table 2-6 Summary of Surface Water Concentrations by OES for Maximum Days of**  
 2270 **Release Scenario**

OES	No. of Releases Modeled	Surface Water Concentration (7Q10) (µg/L)	
		Min	Max
Processing as a Reactant	18	2.9E-05	5.0
OTVD	17	3.4E-06	5.9
Industrial Processing Aid	14	2.4E-05	11
Waste Handling, Disposal, Treatment, and Recycling	13	9.6E-09	34
Manufacturing	10	8.0E-06	18
Other Industrial Uses	8	1.7E-03	31
Other Commercial Uses	7	1.2E-03	3.9E-01
Chemical Maskant	5	5.3E-04	2.8E-01
Import/Repackaging	4	4.0E-07	28
Incorporation into Formulation	4	2.6E-04	135
Dry Cleaning (industrial only)	2	2.2E-02	1.1E-01
Commercial Dry Cleaning Sites	1	3.6E-02	3.6E-02
<b>Overall</b>	<b>103</b>	<b>9.6E-09</b>	<b>135</b>

2271 1. Maximum and central annual release amounts were available for four facilities/sites  
 2272 (Axiall Corporation, Greenchem, Solvents & Chemicals, and Commercial Dry Cleaning  
 2273 Sites). This summary table only compiles the high-end release amount.  
 2274

2275 **Table 2-7 Summary of Surface Water Concentrations by OES for 20 Days of Release**  
 2276 **Scenario for Direct Releaser Facilities**

OES	No. of Releases Modeled	Surface Water Concentration (7Q10) (µg/L)	
		Min	Max
Processing as a Reactant	17	7.2E-04	100
OTVD	16	1.3E-03	77
Industrial Processing Aid	12	6.6E-01	170
Other Industrial Uses	8	2.1E-02	397
Other Commercial Uses	7	2.1E-02	4.6

OES	No. of Releases Modeled	Surface Water Concentration (7Q10) (µg/L)	
		Min	Max
Manufacturing	5	1.2E-04	99
Waste Handling, Disposal, Treatment, and Recycling	5	6.4E-01	6.0
Chemical Maskant	3	4.6E-03	1.3
Import/Repackaging	3	4.0E-06	2.1E-02
Dry Cleaning (industrial only)	2	3.9E-01	1.7
<b>Overall</b>	<b>78</b>	<b>4.0E-06</b>	<b>397</b>

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2278  
2279

**Table 2-8 Summary of Surface Water Concentrations by OES for 20 Days of Release Scenario for Indirect Releaser Facilities**

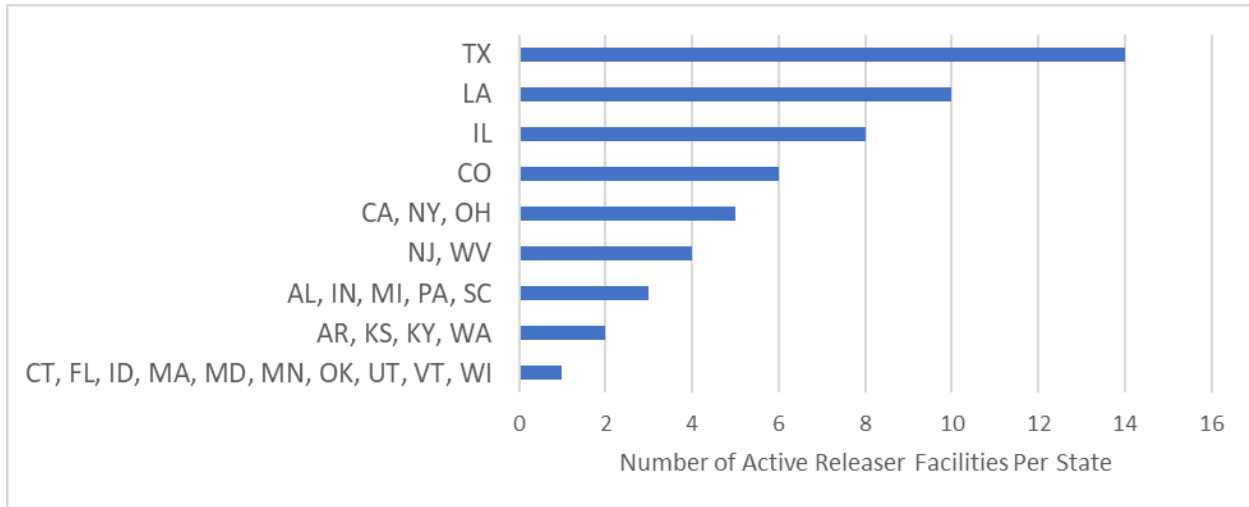
OES	No. of Releases Modeled	Surface Water Concentration (7Q10) (µg/L)	
		Min	Max
Import/Repackaging	1	359	359
Incorporation into Formulation	2	1.0E-02	2034
Manufacturing	1	5.6E-02	5.6E-02
Waste Handling, Disposal, Treatment, and Recycling	4	1.7	436
<b>Overall</b>	<b>8</b>	<b>1.0E-02</b>	<b>2034</b>

2280  
2281

#### 2.3.4.1.2 Characterization of Modeled Releases

2283 As discussed in Section 2.2.1.1, releases of PCE were determined from three data sources (TRI,  
2284 DMRs, and CDR) for the 2016 calendar year, and assigned to 16 TSCA condition of use COU  
2285 categories. Overall, modeling was conducted on 94 unique active releasing facilities plus one  
2286 industry with sites nationwide (12,822 commercial dry cleaning sites). As some facilities may be  
2287 in more than one OES category, and multiple facilities had both direct and indirect releases, a  
2288 total of 103 facilities releases were modeled for both the maximum days of release and 20 days  
2289 of release scenarios, as appropriate. The 94 active releasers were located in 28 states; states with  
2290 the highest number of facilities (5 to 14 each) were TX, LA, IL, CO, CA, NY, and OH. The  
2291 remaining 21 states had 1 to 4 facilities each. Figure 2-4 gives a graphical representation of the  
2292 number of active releasers were for each state.  
2293

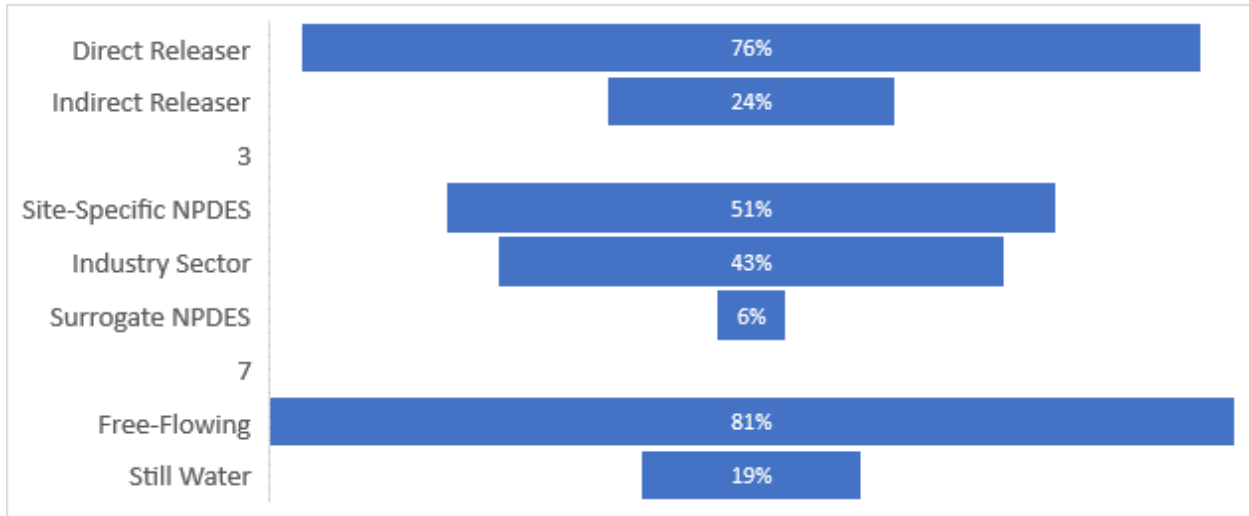




**Figure 2-4. Distribution of Active Facility Releases Modeled**

The location of the actual releases, when accounting for indirect dischargers, occurred in 27 states (all states as the active releaser, except CT). With respect to watersheds, the releases occurred across 66 HUC-8 areas and 82 HUC-12 areas. Over three quarters of the HUCs with facilities contained only 1 release location (76% for HUC-8 and 93% for HUC-12). The remaining HUCS contained 2 to 5 release locations each.

Direct and indirect dischargers accounted for 76% and 24% of the total releases modeled, respectively. Site-specific waterbody flow/dilution data (identified via NPDES) were available in E-FAST 2014 ([U.S. EPA 2014b](#)) for the majority of the releases (51%); surrogate site-specific waterbody flow/dilution data were identified for 6% of the cases; and the remaining cases (43%) were run using a representative industry sector SIC code. For releases modeled with a NPDES (including a surrogate NPDES), surface water concentrations were calculated for free-flowing water bodies in 81% of the cases, and still water bodies for the remaining cases (19%). Figure 2-5 gives a graphical representation of the modeled releases described above.



**Figure 2-5. Modeled Release Characteristics (Percent Occurrence)**

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The predicted surface water concentrations for 65 modeled releases exceeded the lowest COC, and the PDM days of exceedance for 41 modeled releases was 20 days or more. In general, facilities with exceedances were facilities that had higher annual release amounts. Many releases, but not all, were modeled using surrogate stream flows based on the industry sector. Concentrations calculated using surrogate stream flows could be refined with the use of site-specific data.

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For indirect releasers, Lord Corp in Saegertown, PA (OES: Incorporation into Formulation), had the highest surface water concentrations (both maximum days of release and 20 days of release scenarios). The annual release at this facility was the highest of all active releasers, and generally was an order of magnitude higher than all other releases. Stream flows for the receiving facility (EQ DETROIT INC, as determined from TRI) was not available in E-FAST (U.S. EPA 2014b) and therefore the indirect release was modeled using a surrogate industry sector (SIC Code Option).

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For direct releasers, GM Components Holdings LLC in Lockport, NY (OES: OTVD), had the highest surface water concentrations (both maximum days of release and 20 days of release scenarios). This facility had an annual release amount significantly lower than Lord Corp in Saegertown, PA described above, but was modeled using site-specific stream flow data for a free-flowing waterbody. A detailed summary table by facility is provided in the supplemental file “Risk Evaluation for PCE Data Extraction for Consumer and Aquatic Exposure Monitoring Studies”.

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### **2.3.4.2 Monitored Surface Water Concentrations**

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#### **2.3.4.2.1 Measured Surface Water Concentrations from WQX/WQP**

A summary of the WQX data obtained from the WQP is provided in Table 2-9 below for years 2013-2017. Per year, the cleansed datasets evaluated contained between 171 and 512 surface water samples collected from 89 to 193 unique monitoring stations. Detection frequencies were low, ranging from 5.5E-01 to 7.6%. Concentrations ranged from not detected (ND; <2.6E-02 to 5) to 9.2E-02 µg/L in 2013, ND (<2.2E-02 to 5) to 1.6 µg/L in 2014, ND (<3.4E-02 to 1.8) to

2357 3.2E-02 µg/L in 2015, ND (<2.8E-02 to 5) to 5.2E-02 µg/L in 2016, and ND (<3.6E-02 to 5) to  
 2358 6.2E-01 µg/L in 2017. The temporal trend based on the average and maximum concentrations of  
 2359 all samples is graphically presented in Figure 2-6. A peak was observed in 2014, however  
 2360 caution should be used in interpreting trends with this data due to the small number of samples  
 2361 and the lack of samples collected from the same sites over multiple years.  
 2362

2363 **Table 2-9.** Measured Concentrations of PCE in Surface Water Obtained from the Water Quality  
 2364 Portal: 2013-2017<sup>8</sup>

Year	Detection Frequency	Concentration in All Samples (µg/L)			Concentrations (µg/L) in Only Samples Above the Detection Limit		
		No. of Samples (No. of Unique Stations)	Range <sup>9</sup>	Average ± Standard Deviation (SD)	No. of Samples (No. of Unique Stations)	Range	Average ± SD <sup>10</sup>
2013	0.5%	366 (172)	ND (2.6E-02 to 5) to 9.2E-02	2.3E-01 ± 5.8E-01	2 (2)	7.2E-02 to 9.2E-02	8.2E-02 ± 1.4E-02
2014	7.6%	512 (193)	ND (2.2E-02 to 5) to 1.6	1.9E-01 ± 5.0E-01	39 (19)	1.1E-02 to 1.6	2.0E-01 ± 3.5E-01
2015	1.7%	347 (166)	ND (3.4E-02 to 1.8) to 3.2E-02	2.0E-01 ± 1.7E-01	6 (2)	1.7E-02 to 3.2E-02	2.5E-02 ± 6.0E-03
2016	3.5%	201 (91)	ND (2.8E-02 to 5) to 5.2E-02	2.9E-01 ± 7.6E-01	7 (4)	1.4E-02 to 5.2E-01	2.9E-02 ± 1.3E-02
2017	5.9%	171 (89)	ND (3.6E-02 to 5) to 6.2E-01	3.4E-01 ± 7.5E-01	10 (5)	1.8E-02 to 6.2E-01	2.4E-01 ± 2.6E-01
All 5 Years	4.0%	1597 (454)	ND (2.2E-02 to 5) to 1.6	2.3E-01 ± 5.5E-01	64 (27)	1.1E-01 to 1.6	1.7E-01 ± 2.9E-01

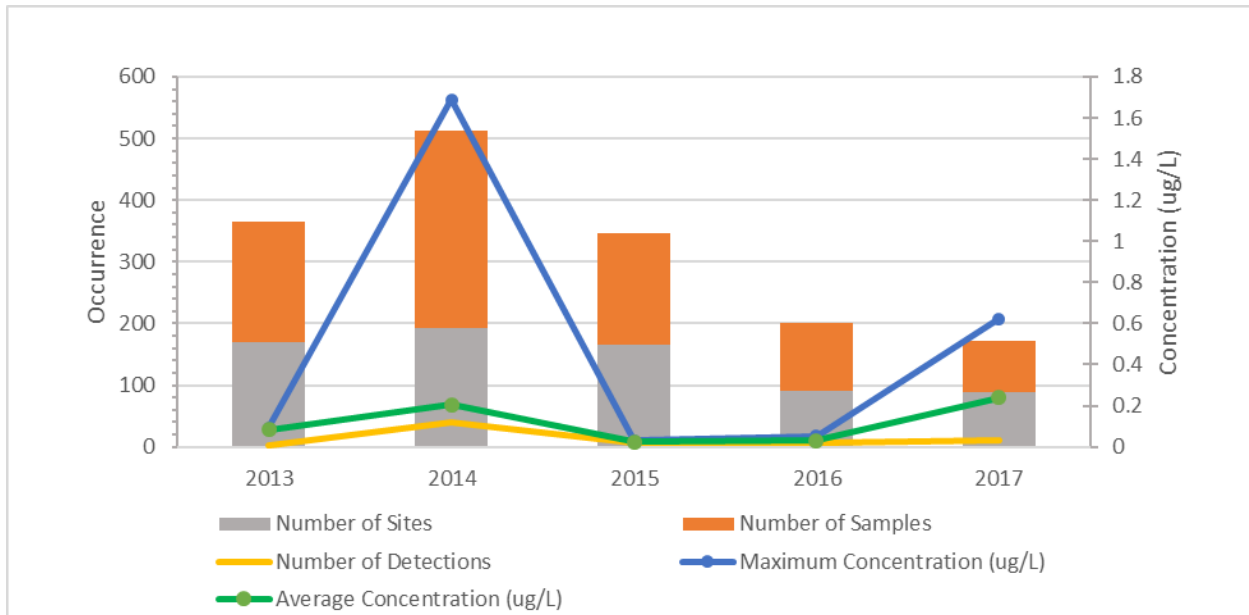
2365

<sup>8</sup> Data were downloaded from the Water Quality Portal (([Nwqmc 2017](#)), [www.waterqualitydata.us](http://www.waterqualitydata.us)) on 10/3/2018 by selecting “Tetrachloroethene (NWIS, STORET)” for the Characteristic. Results were reviewed and filtered to obtain a cleansed dataset (i.e., samples/sites were eliminated if identified as estimated, quality control, media type other than surface water, Superfund, landfill, failed laboratory quality control, etc.).

<sup>9</sup> ND = Not Detected. Reported detection limits varied between samples, as shown in parenthesis.

<sup>10</sup> Calculations were performed using ½ the reported detection limit when results were reported as not detected. If a detection limit was not provided, calculations were performed using ½ the average of the reported detection limits in all samples (average = 0.3 µg/L).

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**Figure 2-6. Temporal WQX Sampling and Surface Water Concentration Trends: 2013 - 2017**

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The quantitative ecological assessment used the 2016 data set only. For the 2016 data, only 7 samples from 4 monitoring sites (all in Tennessee) had PCE concentrations above the detection limit. The concentrations ranged from 1.4E-02 to 5.2E-02  $\mu\text{g/L}$ , which are below the lowest COC of 1.4  $\mu\text{g/L}$ .

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Only one sample in the 2013-2017 dataset (Sample ID nwisnc.01.01400387) had a concentration that exceeded the lowest COC of 1.4  $\mu\text{g/L}$ . This sample was collected in 2014 from Marsh Creek near New Hope, NC (Site ID USGS-0208732885) and had a concentration of 1.6  $\mu\text{g/L}$ . The sample site was not co-located with any 2016 active releaser facility.

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### 2.3.4.2.2 Characterization of WQP Data

2382

The original dataset downloaded contained 7,661 samples for years 2013 through 2017.

2383

Following the filtering and cleansing procedure, only 21% of the samples remained ( $n = 1,604$ ).

2384

The majority of the samples (94%) were excluded because they were an off-topic media (i.e.,

2385

groundwater, artificial, bulk deposition, leachate, municipal waste, or stormwater) or location

2386

type (i.e., landfill, subsurface, spring, or well). A smaller number of samples were excluded

2387

because they were quality control samples (~2%), estimated values (~1%), or had other quality

2388

control issues (<1%). Samples associated with one Superfund site (Palermo Wellfield Superfund

2389

Site) were also excluded.

2390

2391

For the 2016 cleansed dataset ( $n = 201$  samples), observations were made in 19 states/territories

2392

(AZ, IN, KS, LA, MD, MI, MN, MO, NJ, NM, NY, OH, OR, PA, PR, TN, TX, UT, and WI) at

2393

91 unique monitoring sites, with 1 to 6 samples collected per sampling site. On a watershed

2394

level, observations were made in 47 HUC-8 areas and 68 HUC-12 areas. The majority of HUCs

2395

had only one monitoring site (68% for HUC-8; 78% for HUC-12). Up to 9 sites were present in a

2396 HUC-8 and up to 4 sites in a HUC-12. A list of individual HUCs, including the number of  
 2397 monitoring sites and samples in each HUC, is provided in 5.3.68 Appendix D, Table\_Apx D-2 for  
 2398 HUC-8 and Table\_Apx D-3 for HUC-12  
 2399

2400 An analysis of the 2016 cleansed dataset was also conducted to determine if any monitoring  
 2401 station may be associated with Superfund sites that could be contributing to PCE releases, and  
 2402 thus would not fall under the scope of this TSCA evaluation. For samples with concentrations  
 2403 above the detection limit, there are four monitoring stations within 5 miles of a Superfund  
 2404 site. However, there is no hydrologic connectivity as all four are located in a HUC that is  
 2405 adjacent to the superfund site and not in the same HUC itself. For monitoring stations that were  
 2406 also co-located in the same HUC as a facility, a search was also conducted for Superfund sites  
 2407 within 1 mile. There are two co-located monitoring stations within one mile of a superfund site:  
 2408 USGS-04092750 and USGS-04095090. While USGS-04092750 is found in the same HUC as a  
 2409 facility it is on a separate portion of the stream network from the facility. The other station  
 2410 USGS-04095090, is however immediately downstream of a superfund site and is closer to it (at  
 2411 0.24 miles) than it is to the upstream facility (at 2.3 miles). Concentrations at this site were not-  
 2412 detect (sampled in 2015-2017). No monitoring data from WQP was excluded based on proximity  
 2413 to a Superfund site through this Superfund analysis.  
 2414

#### 2415 2.3.4.2.3 Measured Concentrations of PCE from Published Literature

2416 EPA's review of published literature yielded only a minimal amount of surface water monitoring  
 2417 data for PCE in the U.S.; a summary of the individual studies is provided in Table 2-2-10.. Only  
 2418 three studies were identified ([USGS 2006](#)), ([USGS 2003](#)), and ([Singh et al. 1983](#))), which  
 2419 encompassed 416 surface water samples collected from rivers and oceans between 1979 and  
 2420 2001. The reported concentrations of PCE ranged from below the detection limit (1.0E-04 to 0.2)  
 2421 to 5.5 µg/L, with reported central tendency values ranging from <0.2 to 0.7 µg/L. The overall  
 2422 detection frequency is a maximum of approximately 12%. The maximum concentration was  
 2423 collected during a large nationwide survey of surface water for drinking water sources (rivers  
 2424 and reservoirs) between 1999 and 2000 ([USGS 2006](#))), in which PCE was only detected in 3 of  
 2425 375 samples. The next highest reported concentration was only 2.8E-03 µg/L, from a sample  
 2426 collected in the Eastern Pacific Ocean in 1979-1981 ([Singh et al. 1983](#)).  
 2427  
 2428

2429 **Table 2-2-10.** Levels of PCE in U.S. Surface Water from Published Literature

Country	Site Information	Date Sampled	N (Detection Frequency)	Concentration (µg/L)		HERO/ Source	Data Quality Score
				Range	Central Tendency (±SD)		
United States	Anchorage, AK; Chester Creek (6 urban sampling sites)	1998-2001	11 (0)	All ND (<0.2)		3975042	Medium
United States	Nation-wide; Surface water for drinking	1999-2000	375 (8.0E-03)	ND (<0.2)–5.5	NR	3975046	Medium

Country	Site Information	Date Sampled	N (Detection Frequency)	Concentration (µg/L)		HERO/ Source	Data Quality Score
				Range	Central Tendency (±SD)		
	water sources (rivers and reservoirs)						
United States	Eastern Pacific Ocean (California, US to Valparaiso, Chile)	1979-1981	30 (0.9)	ND (<1.0E-04) – 2.8E-03	Mean: 0.7 (7.0E-04); Median: 4.0E-04	29192	Medium

2430 NR = Not reported

2431 ND = Not detected; detection limit reported in parenthesis if available.

2432 **2.3.4.2.4 Geospatial Analysis Comparing Predicted and Measured Surface**  
 2433 **Water Concentrations**

2434 A geospatial analysis at the watershed level (HUC-8 and HUC-12) was conducted to compare  
 2435 the measured and predicted surface water concentrations in 2016 and investigate if the facility  
 2436 releases may be associated with the observed concentrations in surface water. A geographic  
 2437 distribution of the concentrations can be found in Section 4, Figure 4-1 and Figure 4-2 (east and  
 2438 west US, respectively) for the maximum days of release scenario, and in Figure 4-3 and Figure  
 2439 4-4 (east and west US, respectively) for the 20-days of release scenario. Overall, there are 33  
 2440 U.S. states/territories with either a measured concentration or a predicted concentration; at the  
 2441 watershed level, there are 109 HUC-8 areas and 149 HUC-12 areas with either measured or  
 2442 predicted concentrations. Appendix D Table\_Apx D-2 and Table\_Apx D-3 provides a list of  
 2443 states/territories with facility releases (as mapped) and/or monitoring sites.  
 2444

2445 **2.3.4.2.5 Co-location of PCE Releasing Facilities and Monitoring Stations**

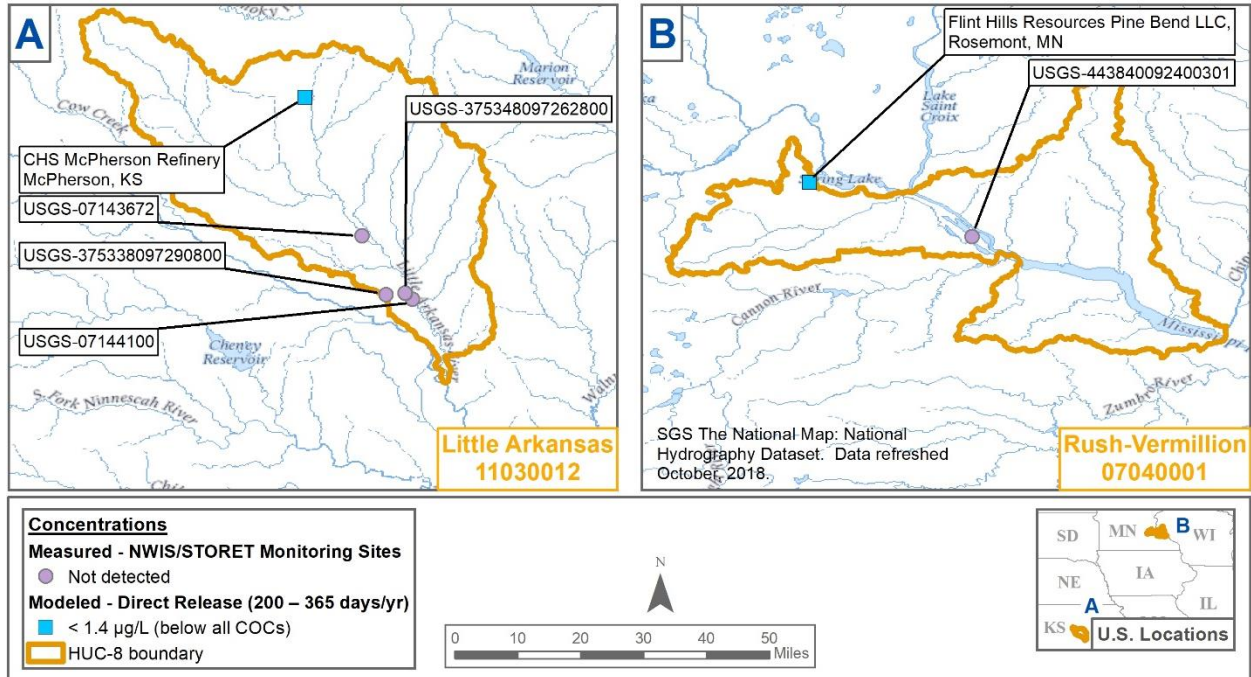
2446 The co-occurrence of PCE releasing facilities and monitoring stations in a HUC is shown in  
 2447 Figure 2-7 (Little Arkansas and Rush-vermillion) and Figure 2-8 (Little Calument-Galien and  
 2448 Lower Grand). There are four HUC-8 areas that have both measured and predicted  
 2449 concentrations. As the measured concentrations were below the detection limit and the number  
 2450 of samples collected was small, definitive conclusions could not be drawn on possible  
 2451 associations between measured concentrations in surface water and predicted concentrations  
 2452 from facility releases. The collocated facilities and monitoring stations are briefly described  
 2453 below and summarized in

2454 Table 2-11.

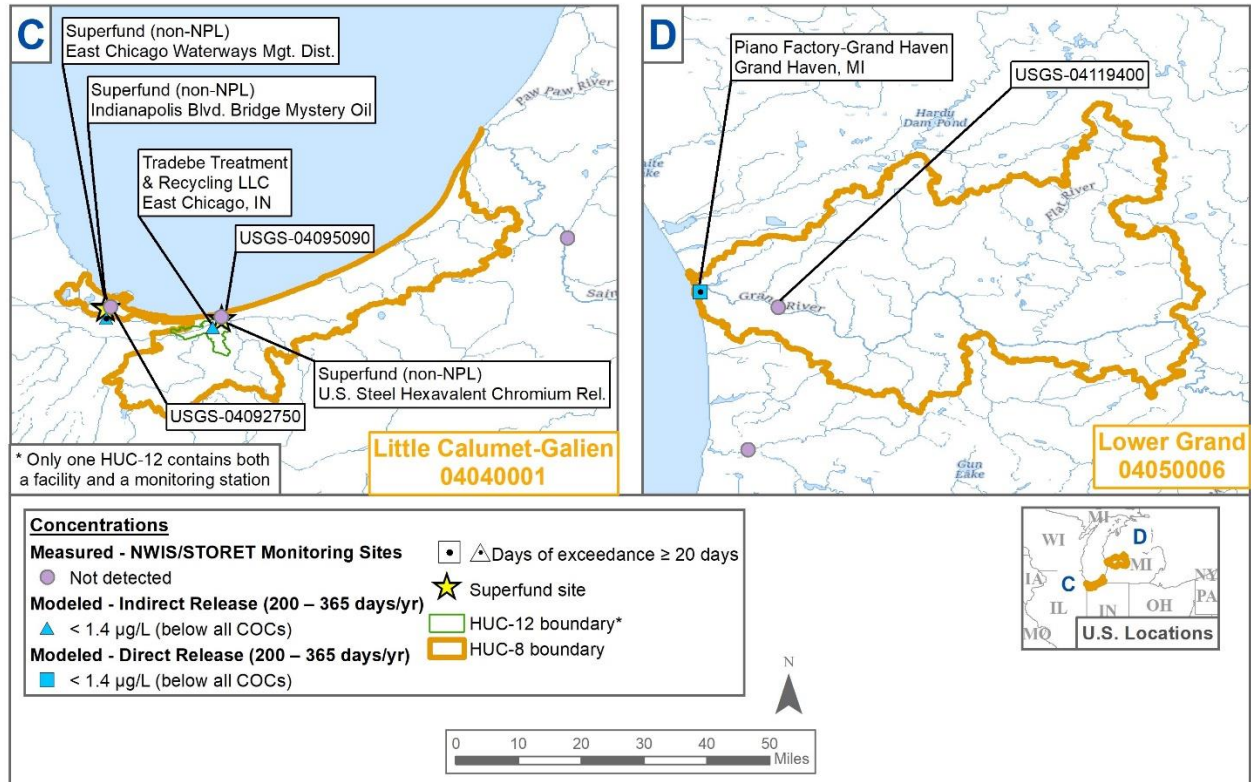
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- A. HUC 11030012 (Little Arkansas in Kansas) has one facility with modeled 7Q10 surface water concentrations ranging from 4.4E-02 to 6.6E-01 ppb, and 7 monitoring stations all with concentrations less than the reported detection limit (<0.1 ppb). The monitoring stations are over 20 miles downstream of the facility or are neither up nor downstream of the facility.
- B. HUC 07040001 (Rush-Vermillion in Minnesota) has one facility with modeled 7Q10 surface water concentrations ranging from 2.8E-03 to 5.6E-02 ppb, and 1 monitoring station with a non-detect concentration (<0.1 ppb) that is located approximately 20 miles downstream of the facility.
- C. HUC 04040001 (Little Calumet-Galien in Indiana) has one receiving facility with concentrations ranging from 0.1 to 1.7 ppb, and two monitoring stations with non-detect concentrations (<0.1 ppb). The monitoring stations are either over 2 miles downstream of the facility, or neither up nor downstream of the facility. It should be noted however, that a modeled receiving facility (East Chicago Municipal Sewage Treatment Plant; FRS 110006645531) is located just outside of the HUC on the south side. Monitoring site USGS-04092750 is located on a canal/ditch north of the facility; based on NHD water flows south from the monitoring site toward the facility.
- D. HUC 04050006 (Lower Grand in Michigan), has one receiving facility with concentrations ranging from 0.1 to 1.0 ppb, and one monitoring station with non-detect concentrations (<0.1 ppb).

2480 **Figure 2-7. Colocation of PCE Releasing Facilities and WQX Monitoring Stations at the**  
 2481 **HUC 8 and HUC 12 Level**



2482 **Figure 2-8. Colocation of PCE Releasing Facilities and WQX Monitoring Stations at the**  
 2483 **HUC 8 and HUC 12 Level**  
 2484  
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**Table 2-11.** Co-Location of Facility Releases and Monitoring Sites within HUC 8 and HUC 12 Boundaries (Year 2016)

Map	HUC 8	Facilities in HUC		Monitoring Sites in HUC			
		Site (Name, Location, FRS)	Modeled 7Q10 Surface Water Concentrations <sup>a</sup> (µg/L)	Monitoring Site ID	No. of Samples	Measured Surface Water Concentrations (µg/L)	Location Relative to Facility <sup>b</sup> (Miles)
A	11030012 Little Arkansas	CHS McPherson Refinery McPherson, KS (FRS 110015862440)	300 days: 4.4E- 02 20 days: 0.6	USGS- 07143672	4	<0.1 (all)	Downstream/23
				USGS- 07144100	4	<0.1 (all)	Downstream/34
				USGS- 3753380972 90800	2	<0.1 (all)	Downstream/33
				USGS- 3753480972 62800	2	<0.1 (all)	Downstream/33
				USGS- 3753380972 90800	2	<0.1 (all)	Neither/42
B	07040001 Rush- Vermillion	Flint Hills Resources Pine Bend LLC <i>Rosemount, MN</i> (FRS 110000424611)	350 days: 2.8E- 03 20 days: 5.6E- 02	USGS- 4438400924 00301	1	<0.1	Downstream/20
C	04040001 Little Calumet- Galien	Tradebe Treatment & Recycling LLC East Chicago, IN (FRS 110000397874)	250 days: 0.1 20 days: <b>1.7<sup>a</sup></b>	USGS- 04095090 <sup>c</sup>	1	<0.1	Downstream/2.3
		Receiving Facility (modeled site): Advanced Waste Services of Indiana LLC/Covanta Environmental Solutions LLC Portage, IN		USGS- 04092750 <sup>d</sup>	4	<0.1 (all)	Neither/14

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Map	HUC 8	Facilities in HUC		Monitoring Sites in HUC			
		Site (Name, Location, FRS)	Modeled 7Q10 Surface Water Concentrations <sup>a</sup> (µg/L)	Monitoring Site ID	No. of Samples	Measured Surface Water Concentrations (µg/L)	Location Relative to Facility <sup>b</sup> (Miles)
		(FRS 110020159852)					
D	04050006 Lower Grand	Piano Factory-Grand Haven Grand Haven, MI (FRS 110006739832)	260 days: 0.1* 20 days: 1.0	USGS- 04119400	4	<0.1 (all)	Upstream/10

2489  
2490  
2491  
2492  
2493  
2494  
2495

<sup>a</sup> Concentrations above the COC of 1.4 µg/L are shown in bold. Concentrations leading to modeled days of exceedance ≥20 days are indicated by an asterisks (\*).

<sup>b</sup> The number of miles between the facility and monitoring site are based on Euclidean distance.

<sup>c</sup> The HUC 8 co-located facility and monitoring station are also in the same HUC 12 (040400010509; Willow Creek-Burns Ditch).

<sup>d</sup> The East Chicago Municipal Sewage Treatment Plant (FRS 110006645531), which receives wastewater from Safety Kleen Systems, Inc. in East Chicago, IN is not located in the HUC, but is located just south of the HUC, near monitoring site USGS-04092750. This monitoring site is located on a canal/ditch, and according to NHD, the water flows south from the monitoring site toward the facility.

2496

2497 **2.3.4.3 Biomonitoring Data**

2498 EPA identified blood biomonitoring measurements from multiple sources. The most  
2499 comprehensive source is the National Health and Nutrition Examination Survey (NHANES)  
2500 conducted by CDC's National Center for Health Statistics (NCHS). The survey is "a complex,  
2501 stratified, multistage, probability-cluster design survey" designed to collect data on the health  
2502 and nutrition of a representative sample of the US population. NHANES measured PCE in whole  
2503 blood of males and females ages 12+ years. In the Fourth Report on Human Exposure to  
2504 Environmental Chemicals ([CDC 2017](#)), statistics were reported for the 50<sup>th</sup>, 75<sup>th</sup>, 90<sup>th</sup>, and 95<sup>th</sup>  
2505 percentiles for 2-year cycles starting in 2001 through 2008. Sample sizes ranged from 978 (2001-  
2506 2002) to 2,940 (2005-2006). The concentrations in all samples were less than the limit of  
2507 detection (0.048 ng/mL) at the 50<sup>th</sup> percentile for all years. At the 95<sup>th</sup> percentile, concentrations  
2508 ranged from 9.4E-02 µg/L (2007-2008) to 1.9E-01 µg/L (2001-2002).

2509  
2510 For 1999-2004 (n=2577), the mean sample concentration was 8.1E-02 µg/L, and the median  
2511 sample concentration was 3.4E-02 µg/L. This study also reported regression statistics,  
2512 coefficients, and trends over time for each chemical reported. Another source ([Sexton et al.](#)  
2513 [2005](#)), measured concentrations of PCE in whole blood from 150 children from two poor,  
2514 minority neighborhoods in Minneapolis, Minnesota in four periods during 2000-2001. These  
2515 samples were collected as part of the School Health Initiative: Environment, Learning, Disease  
2516 (SHIELD) study. PCE was detected in 37 to 63% of the samples, with concentrations ranging  
2517 from 2.0E-02 – 3.0E-02 ng/mL (10th percentile) to 0.1-0.8 ng/mL (99th percentile). The limit of  
2518 detection was 2.2E-02 ng/mL. The SHIELD study also collected 2-day, integrated personal air  
2519 samples. Blood samples were also collected as part of the National Human Exposure Assessment  
2520 Survey (NHEXAS) Phase I conducted by EPA ([Clayton et al. 1999](#)). Samples were collected  
2521 from 147 people in six states (IL, IN, OH, MI, MN, and WI) in 1995-1997. PCE was detected in  
2522 37% of the samples, with a mean of 0.2 ng/mL, a 50<sup>th</sup> percentile of 5.0E-02 ng/mL, and a 90<sup>th</sup>  
2523 percentile of 0.1 ng/mL. NHEXAS Phase I also collected indoor air and personal air samples.  
2524 PCE concentrations in blood were similar between the NHANES, SHIELD, and NHEXAS  
2525 surveys conducted between 1995 and 2016.

2526  
2527 In addition to blood samples, NHANES also collected urine samples for the PCE metabolite N-  
2528 Acetyl-S-(trichlorovinyl)-L-cysteine. Samples were collected for males and females ages 6+  
2529 years. Statistics were reported for both uncorrected urine concentrations and creatine corrected  
2530 urine concentrations. Data were reported for the survey years 2011-2012, and all samples  
2531 measured (n=2,464-2,466) were below the detection limit of 3.0 µg/L. The NHANES urine  
2532 metabolite data for PCE was also used in a 2015 study analyzing the reported data to develop  
2533 means and other descriptive statistics (Jain, 2015). In that paper, the urinary metabolite TCVMA  
2534 was reported in measurements of male (n=203) and female children (n=214) in 2011 and 2012.  
2535 The mean concentration for male children was reported as 6.9 ng/mL and 6.4 ng/mL for female  
2536 children. The 95% confidence interval around the mean was reported as 5.8 to 8.4 ng/mL for  
2537 male children and 5.2 to 8.0 ng/mL for female children

2538  
2539 Breath samples were also collected as part of the Total Exposure Assessment Methodology  
2540 (TEAM) Study ([Wallace 1987](#)), which also collected concurrent personal inhalation monitoring  
2541 samples and outdoor air samples. In Phase II and III of the study conducted between 1981 and

2542 1984, samples were collected from adults conducting normal daily activities in  
2543 industrial/chemical manufacturing and /or petroleum refining regions of the US, including  
2544 Elizabeth and Bayonne, NJ, Los Angeles, CA, and Contra Costa, CA (n= 660). Arithmetic  
2545 means ranged from 8.3 to 13  $\mu\text{g}/\text{m}^3$ , with detection in 58 to 100% of samples.  
2546

#### 2547 **2.3.4.4 Assumptions and Key Sources of Uncertainty for Environmental** 2548 **Exposures**

---

2549 The WQP Tools contains data from USGS-NWIS and STORET databases, and is one of the  
2550 largest environmental monitoring databases in the U.S. ([Nwqmc 2017](#)); however, comprehensive  
2551 information needed for data interpretation is not always reasonably available. In some instances,  
2552 proprietary information may be withheld, or specific details regarding analytical techniques may  
2553 be unclear, or not reported at all. As a result of all of these shortcomings, there are uncertainties  
2554 in the reported data that are difficult to quantify with regard to impacts on exposure estimates.  
2555

2556 The quality of the data provided in the USGS-NWIS and STORET datasets varies, and some of  
2557 the information provided is non-quantitative. While a large number of individual sampling  
2558 results were obtained from these datasets, the monitoring studies used to collect the data were  
2559 not necessarily specifically designed to evaluate PCE distribution across the U.S. The available  
2560 data represent a variety of discrete locations and time periods; therefore, it is uncertain whether  
2561 the reported data are representative of all possible nationwide conditions. Nevertheless, these  
2562 limitations do not diminish the overall findings reported in this assessment that exposure data  
2563 showed very few instances (*i.e.*, less than 0.01 percent) where measured PCE levels in the  
2564 ambient environment exceeded the identified concentrations of concern for water or organisms  
2565 (1.4 ppb). It is also important to note that only a few USGS-NWIS and STORET monitoring  
2566 stations aligned with the watersheds of the PCE releasing facilities identified under the scope of  
2567 this assessment, and the co-located monitoring stations had samples with concentrations below  
2568 the detection limit; therefore, no direct correlation can be made between them. To better  
2569 characterize instream concentrations of PCE in the environment and provide for more robust  
2570 confirmation of our modeled results, we would support the collection of collocated instream  
2571 measurements with known discharging facilities.  
2572

2573 The DMR, TRI and CDR databases represent comprehensive sources of environmental release data  
2574 for the US; however, there are limitations and assumptions involved. These data are self-reported by  
2575 facilities and subject to minimum reporting thresholds; therefore, they may not capture releases from  
2576 smaller facilities (*i.e.*, environmental releases may be underestimated). Some of the reported  
2577 information may be inaccurate because it reflects approximations rather than actual emissions or  
2578 release data. TRI is based on mass balances and emission factors, whereas DMR is based on  
2579 representative pollutant monitoring data at facility outfalls (mg/L) and corresponding wastewater  
2580 discharge (million gallons per day). The assumed maximum days per year of release from each  
2581 facility is uncertain and may in some cases lead to underestimation of daily release rates.  
2582

2583 Use of release information from facility data used to estimate environmental exposures is  
2584 constrained by a number of uncertainties including: the heterogeneity of processes and releases  
2585 among facilities grouped within a given sector; assumptions made regarding sector definitions used  
2586 to select facilities covered under the scope; and fluctuations in the level of production and associated  
2587 environmental releases incurred as a result of changes in standard operating procedures. Uncertainty

2588 may also arise from omissions in the reporting data, such as sectors that are not required to report,  
2589 facilities that fall below the reporting threshold, or facilities for which forms simply are not filed.

2590  
2591 A major limitation associated with use of the E-FAST 2014 ([U.S. EPA 2014b](#)) model relates to the  
2592 assumptions made regarding missing information that was required for model input, such as site-  
2593 specific streamflow data. When site-specific or surrogate site-specific stream flow data were not  
2594 available, flow data based on a representative industry sector was used in the assessment. This  
2595 includes cases where a receiving facility for an indirect release could not be determined.  
2596 Additionally, the data currently available in E-FAST 2014 ([U.S. EPA 2014b](#)) are 15 to 30 years old.  
2597 Although stream conditions do change over time, changes in the flow values are not expected to be  
2598 drastic. More recent flow data are available through the National Hydrological Dataset (NHD). It is  
2599 important to note however, that these limitations are unlikely to change the stated conclusions of this  
2600 assessment because they are based on a series of conservative assumptions that likely overestimate  
2601 exposure potential.

2602  
2603 With respect to the geospatial analysis, a limitation is the accuracy of the latitudes and longitudes.  
2604 The geographic coordinates for facilities were obtained from the FRS Interests geodatabase, which  
2605 are assigned through various methods including photo-interpretation, address matching, and GPS.  
2606 These are considered “Best Pick” coordinates. While EPA does assign accuracy values for each  
2607 record based on the method used, the true accuracy of any individual point is unknown. Also, in  
2608 some cases the receiving facilities for indirect releases could not be determined. In these cases the  
2609 location of the active releaser was mapped. As such, the co-location of facilities and monitoring sites  
2610 may have been missed. As the number of unknown receiving facilities was small and most  
2611 monitoring sites had samples with concentrations below the detection limit, this would have minimal  
2612 impact on the watershed analysis.

#### 2613 **2.3.4.4.1 Confidence in Aquatic Exposure Scenarios**

2614 Confidence ratings for aquatic exposure scenarios are informed by uncertainties surrounding inputs  
2615 and approaches used in modeling surface water concentrations. In Section 2.2.1.1, confidence ratings  
2616 are assigned to these estimated daily releases (kg/site-day) on a per occupational exposure scenario  
2617 (OES) basis and primarily reflect moderate confidence (one OES shows high confidence for this  
2618 estimate). As these release estimates serve as the key inputs into the exposure mode and are  
2619 therefore a key component of the overall aquatic exposure scenario confidence.

2620  
2621 Other considerations that impact confidence in the aquatic exposure scenarios include the model  
2622 used E-FAST 2014, ([U.S. EPA 2014b](#)) and its associated default and user-selected values and related  
2623 uncertainties. As described in Section 4.1.2, there are uncertainties related to the ability of E-FAST  
2624 2014 ([U.S. EPA 2014b](#)) to incorporate downstream fate and transport; the likely number of release  
2625 days from given discharging facilities; and, in some cases (i.e., when the NPDES for the discharging  
2626 facility cannot be found within the E-FAST database), the applied stream flow distribution.

2627  
2628 There are monitoring data available in surface water that reflect both near-facility and ambient (i.e.,  
2629 background) exposure levels in this media in the United States. Samples characterizing background  
2630 levels in surface water ranged from non-detect (ND) to 310 µg/L, from both literature and the Water  
2631 Quality Portal database.

2632

## 2633 **2.4 Human Exposures**

---

2634 EPA evaluated acute and chronic exposures to workers by dermal and inhalation routes and  
2635 occupational non-users (ONUs) by inhalation routes in association with PCE use in industrial and  
2636 commercial applications. EPA also evaluated acute exposures to consumers by dermal and  
2637 inhalation routes in association with PCE use in consumer applications. The assessed conditions of  
2638 use are described above in Table 1-4; however, due to expected similarities in or lack of data to  
2639 distinguish some conditions of use, both exposures/releases and occupational and consumer  
2640 exposures for several of the subcategories of use in Table 1-4 were grouped and assessed together  
2641 during risk evaluation. For example, subcategories for intermediate uses in industrial gas  
2642 manufacturing, basic organic chemical manufacturing, and petroleum refineries may generally have  
2643 similar worker activities, and EPA does not have data to distinguish whether workers are exposed  
2644 differently for these subcategories. Therefore, EPA has grouped these intermediate conditions of use  
2645 into one occupational scenario. A crosswalk of the conditions of use in Table 1-4 to the occupational  
2646 and consumer scenarios assessed in this report is provided in Table 2-12 below.

2647  
2648**Table 2-12 Crosswalk of Subcategories of Use Listed in the Problem Formulation Document to Exposure Scenarios Assessed in the Risk Evaluation**

Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
Manufacture	Domestic manufacture	Domestic manufacture	Section 2.4.1.6– Manufacturing	Manufacturing	N/A
	Import	Import	Section 2.4.1.7 – Repackaging <sup>c</sup>	Repackaging	N/A
Processing	Processing as a reactant/ intermediate	Intermediate in industrial gas manufacturing	Section 2.4.1.8 – Processing as a Reactant	Processing as Reactant/ Intermediate	N/A
		Intermediate in basic organic chemical manufacturing			
		Intermediate in petroleum refineries			
		Residual or byproduct reused as a reactant <sup>d</sup>			
	Incorporated into formulation mixture or reaction product	Cleaning and degreasing products	Section 2.4.1.9 – Incorporation into Formulation, Mixture, or Reactant Product	Incorporation into Formulation - Aerosol Packing; Incorporation into Formulation - Degreasing Solvent; Incorporation into Formulation - Dry Cleaning Solvent; Incorporation into Formulation - Miscellaneous	N/A
		Adhesive and sealant products			
		Paint and coating products			
		Other chemical products and preparations			

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Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
	Processing – Incorporated into articles	Plastic and rubber products	After further review, EPA determined that PCE is not incorporated into plastic articles but rather is used as a degreasing solvent at plastic manufacture sites; therefore, no exposure scenario was developed for incorporation into articles. Use of PCE as a degreasing solvent at plastic manufacture sites is assessed with other degreasing scenarios in Sections 2.4.1.10 through 2.4.1.13	N/A	N/A
	Repackaging <sup>c</sup>	Solvent for cleaning or degreasing	Section 2.4.1.7– Repackaging	Repackaging	N/A
		Intermediate			
	Recycling	Recycling	Section 2.4.1.26– Waste Handling, Disposal, Treatment, and Recycling	Disposal/Recycling	N/A



Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
Distribution in commerce	Distribution	Distribution	Activities related to distribution (e.g., loading, unloading) are considered throughout the life cycle, rather than using a single distribution scenario.	N/A	N/A
Industrial use	Solvents (for cleaning or degreasing)	Solvents and/or Degreasers (cold, aerosol spray or vapor degreaser; not specified in comment)	See sections for specified degreasing and cleaning operations.	See sections for specified degreasing and cleaning operations.	N/A
		Batch vapor degreaser (e.g., open-top, closed-loop)	Section 2.4.1.10– Batch Open-Top Vapor Degreasing; Section 2.4.1.11– Batch Closed-Loop Vapor Degreasing	Open-top Vapor Degreasing; Closed Loop Vapor Degreasing	
		In-line vapor degreaser (e.g., conveyORIZED, web cleaner)	Section 2.4.1.12– ConveyORIZED Vapor Degreasing; Section 2.4.1.13– Web Degreasing	ConveyORIZED Vapor Degreasing; Web Degreasing	
		Cold cleaner	Section 2.4.1.14– Cold Cleaning	Cold Cleaning	
		Aerosol spray degreaser/cleaner	Section 2.4.1.15– Aerosol Degreasing and Aerosol Lubricants	Aerosol Degreasing/ Lubricants	

Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
		Dry cleaning solvent	Section 2.4.1.16– Dry Cleaning and Spot Cleaning	Post-2006 Dry Cleaning (including spot cleaning); 4th/5th Gen Only Dry Cleaning (including spot cleaning)	
		Spot cleaner			
	Lubricants and greases	Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)	Section 2.4.1.15– Aerosol Degreasing and Aerosol Lubricants; Section 2.4.1.20– Metalworking Fluids	Aerosol Degreasing/ Lubricants; Metalworking Fluid	N/A
	Adhesives and sealants	Solvent-based adhesives and sealants	Section 2.4.1.17– Adhesive, Sealants, Paints, and Coatings	Adhesives	N/A
	Paints and coatings including paint and coating removers	Solvent-based paints and coatings, including for chemical milling	Section 2.4.1.17 – Adhesive, Sealants, Paints, and Coatings; Section 2.4.1.18– Maskant for Chemical Milling	Paints/Coatings; Chemical Maskant	N/A

Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
	Processing aids, not otherwise listed	Pesticide, fertilizer and other agricultural chemical manufacturing	Section 2.4.1.19– Industrial Processing Aid	Industrial Processing Aid	N/A
	Processing aids, specific to petroleum production	Catalyst regeneration in petrochemical manufacturing	Section 2.4.1.19– Industrial Processing Aid	Industrial Processing Aid	N/A
	Other uses	Textile processing	Section 2.4.1.22– Other Spot Cleaning/Spot Removers (Including Carpet Cleaning); Section 2.4.1.23– Other Industrial Uses	Other Spot Cleaning/Spot Removers (Including Carpet Cleaning); Other Industrial Uses	N/A
		Wood furniture manufacturing	Section 2.4.1.23– Other Industrial Uses	Other Industrial Uses	
		Laboratory chemicals	Section 2.4.1.25– Laboratory Chemicals	N/A – qualitative assessment	
		Foundry applications	Section 2.4.1.23– Other Industrial Uses	Other Industrial Uses	

Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
Commercial/consumer use	Cleaning and furniture care products	Cleaners and degreasers (other)	Section 2.4.1.21– Wipe Cleaning and Metal/Stone Polishes; Section 2.4.1.22– Other Spot Cleaning/Spot Removers (Including Carpet Cleaning); Section 2.4.1.24 – Other Commercial Uses	Wipe Cleaning and Metal/Stone Polishes; Other Spot Cleaning/Spot Removers (Including Carpet Cleaning); Other Commercial Uses - Mold Release	Section 2.4.2.3.1- Aerosol Degreasers (includes: marine cleaner, degreaser, coil cleaner, electric motor cleaner, parts cleaner, cable cleaner, stainless steel polish, electrical/energized cleaner, wire and ignition demoisurants, electric motor cleaner; brake cleaners)
		Dry cleaning solvent	Section 2.4.1.16– Dry Cleaning and Spot Cleaning	Post-2006 Dry Cleaning (including spot cleaning);	Section 2.4.2.4- Dry Cleaned Articles

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Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
		Spot cleaner		4th/5th Gen Only Dry Cleaning (including spot cleaning)	Combined under Aerosol Cleaner
		Automotive care products (e.g., engine degreaser and brake cleaner)	Section 2.4.1.15– Aerosol Degreasing and Aerosol Lubricants	Aerosol Degreasing/ Lubricants	Section 2.4.2.3.1- Brake Cleaner
		Aerosol cleaner			Section 2.4.2.3.2- Parts Cleaner
					Section 2.4.2.3.3- Vandalism Mark & Stain Remover, Mold Cleaner, Weld Splatter Protectant
		Non-aerosol cleaner	Section 2.4.1.21– Wipe Cleaning and Metal/Stone Polishes	Wipe Cleaning and Metal/Stone Polishes	Section 2.4.2.3.4- Marble and Stone Polish (liquid)

Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
	Lubricants and greases	Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)	Section 2.4.1.15– Aerosol Degreasing and Aerosol Lubricants; Section 2.4.1.20 – Metalworking Fluids	Aerosol Degreasing/ Lubricants; Metalworking Fluid	Section 2.4.2.3.5- Cutting Fluid Section 2.4.2.3.6- Spray Lubricant and Penetrating Oil
	Adhesives and sealant chemicals	Adhesives for arts and crafts	Not assessed in occupational settings – consumer use only	N/A	Section 2.4.2.3.7- Adhesives (includes industrial adhesive, arts and crafts adhesive, gun ammunition sealant) Section 2.4.2.3.8 - Livestock Grooming Adhesive
		Light repair adhesives	Section 2.4.1.17– Adhesive, Sealants, Paints, and Coatings	Adhesives	Section 2.4.2.3.9- Column Adhesive, Caulk and Sealant

Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
	Paints and coatings	Solvent-based paints and coatings	Section 2.4.1.17– Adhesive, Sealants, Paints, and Coatings	Paints/Coatings	Section 2.4.2.3.10- Outdoor watershield (liquid)
					Section 2.4.2.3.11- Coatings and primers (aerosol)
					Section 2.4.2.3.12-Rust Primer and Sealant (liquid)
					Section 2.4.2.3.13- Metallic Overglaze
	Other Uses	Carpet cleaning	Section 2.4.1.22– Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	Not found as consumer product
		Laboratory chemicals	Section 2.4.1.25– Laboratory Chemicals	N/A – qualitative assessment	Not assessed in consumer setting – occupational use only

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Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
		Metal (e.g., stainless steel) and stone polishes	Section 2.4.1.21 - Wipe Cleaning and Metal/Stone Polishes	Wipe Cleaning and Metal/Stone Polishes	Section 2.4.2.3.14- Marble and Stone Polish (wax)
		Inks and ink removal products	Section 2.4.1.24 – Other Commercial Uses	Other Commercial Uses - Printing	Ink removal combined under Aerosol Cleaner (vandalism and stain remover); use in printing inks discussed as “other use”
		Welding <sup>c</sup>	Section 2.4.1.15– Aerosol Degreasing and Aerosol Lubricants <sup>b</sup>	Aerosol Degreasing/ Lubricants	Combined under Aerosol Cleaner (weld splatter protectant)
		Photographic film	Section 2.4.1.24– Other Commercial Uses	Other Commercial Uses - Photographic Film	Not found as consumer product
		Mold cleaning, release and protectant products	Section 2.4.1.24 – Other Commercial Uses	Other Commercial Uses - Mold Release	Combined under Aerosol Cleaner (mold cleaner)



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Life Cycle Stage	Category <sup>a</sup>	Subcategory <sup>b</sup>	Occupational Exposure Scenario	Associated Condition of Use in Risk Calculator	Consumer Exposure Scenario
Disposal <sup>f</sup>	Disposal	Industrial pre-treatment	Section 2.4.1.26 - Waste Handling, Disposal, Treatment and Recycling	Process Solvent Recycling and Worker Handling of Wastes	N/A
		Industrial wastewater treatment			
		Publicly owned treatment works (POTW)			
		Underground injection			
		Municipal landfill			
		Hazardous landfill			
		Other land disposal			
		Municipal waste incinerator			
		Hazardous waste incinerator			
		Off-site waste transfer			
		Off-site waste transfer			

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<sup>a</sup> These categories of conditions of use appear in the Life Cycle Diagram, reflect CDR codes, and broadly represent conditions of use of PCE in industrial and/or commercial settings.

<sup>b</sup> These subcategories reflect more specific uses of PCE.

<sup>c</sup> The repackaging scenario covers only those sites that purchase PCE or PCE containing products from domestic and/or foreign suppliers and repackage the PCE from bulk containers into smaller containers for resale. Sites that import and directly process/use PCE are assessed in the relevant condition of use. Sites that import and either directly ship to a customer site for processing or use or warehouse the imported PCE and then ship to customers without repackaging are assumed to have no exposures or releases and only the processing/use of PCE at the customer sites are assessed in the relevant conditions of use.

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<sup>d</sup> EPA assessed PCE as a reactant where it was produced as a byproduct from EDC manufacture and reused as a reactant.

<sup>e</sup> Identified welding products were anti-spatter aerosol products; therefore, the assessment is included with the assessment of other aerosol products.

<sup>f</sup> Each of the conditions of use of PCE may generate waste streams of the chemical that are collected and transported to third-party sites for disposal, treatment, or recycling. Industrial sites that treat, dispose, or directly discharge onsite wastes that they themselves generate are assessed in each condition of use assessment. This section only assesses wastes of PCE that are generated during a condition of use and sent to a third-party site for treatment, disposal, or recycling.

## 2.4.1 Occupational Exposures

The following subsections describe EPA’s approach to assessing occupational exposures and results for each condition of use assessed. For additional details on development of approaches and results refer to the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)).

### 2.4.1.1 Approach to Workers and Occupational Non-Users

As described in the *Problem Formulation of the Risk Evaluation for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro)*([U.S. EPA 2018d](#)), for each condition of use, EPA endeavors to distinguish exposures for workers and occupational non-users (ONUs). Normally, a primary difference between workers and ONUs is that workers may handle PCE and have direct contact with the chemical, while ONUs are working in the general vicinity of workers but do not handle PCE and do not have direct contact with PCE being handled by the workers. The size of the area that ONUs may work can vary across each OES and across facilities within the same OES and will depend on the facility configuration, building and room sizes, presence of vapor barrier, and worker activity pattern. For example, an ONU can be a production employee whose workstation is located on the factory floor where a degreasing unit is installed. Absence of any vapor barrier (e.g., walls) between the degreaser and the rest of the factory, this “area” can be an entire factory floor. Alternately, the area can be in a specific room of a building where a chemical is handled (e.g., a room in a dry cleaning shop where the dry cleaning machine is installed and where dry cleaned loads are unloaded, pressed, and finished). Where possible, for each condition of use, EPA identified job types and categories for workers and ONUs.

EPA evaluated inhalation exposures to workers and ONUs, and dermal exposures to workers. EPA did not assess dermal exposures to ONUs as EPA does not expect ONUs to have routine dermal exposures in the course of their work. Depending on the condition of use, ONUs may have incidental dermal exposures due to surface contamination. However, data (e.g., frequency and amount of liquid on the skin after contact) were not identified to assess this exposure.

### 2.4.1.2 Number of Workers and Occupational Non-Users Approach and Methodology

Where available, EPA used CDR data to provide a basis to estimate the number of workers and ONUs. EPA supplemented the available CDR data using available market data; NAICS and SIC code data from TRI, DMR, and NEI sites identified for each condition of use (for number of sites estimates see Section 2.2.1.2.2); and analyzing Bureau of Labor Statistics (BLS) and U.S. Census data using the methodology described in the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)). Where market penetration data and site-specific NAICS/SIC codes from TRI/DMR/NEI were not available, EPA estimated the number of workers using data from GSs and ESDs. For additional details on development of estimates of number of workers refer to Appendix A in the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)).

Table 2-13 presents the confidence rating of data that EPA used to estimate number of sites and workers.

**Table 2-13. Data Evaluation of Sources Containing Number of Worker Estimates**

Source Reference	Data Type	Data Quality Rating	Condition(s) of Use
( <a href="#">U.S. EPA 2016d</a> )	Number of Workers	High	Manufacturing

( <a href="#">U.S. BLS 2016</a> )	Number of Workers	High	Manufacturing; Repackaging; Processing as a Reactant; Incorporation into Formulation, Mixture, or Reaction Product; Cold Cleaning; Aerosol Degreasing and Aerosol Lubricants; Dry Cleaning and Spot Cleaning; Adhesives, Sealants, Paints, and Coatings; Chemical Maskants; Industrial Processing Aid; Other Industrial Uses; Laboratory Chemicals; Waste Handling, Disposal, Treatment, and Recycling
( <a href="#">U. S. Census Bureau 2015</a> )	Number of Workers	High	
( <a href="#">OECD 2017a</a> )	Number of Workers	N/A – ESD	OTVD, Closed-Loop Vapor Degreasing, Conveyorized Vapor Degreasing, Web Degreasing
( <a href="#">OECD 2011</a> )	Number of Workers	N/A – ESD	Metalworking Fluids
( <a href="#">OECD 2017b</a> )	Number of Workers	N/A – ESD	Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)
( <a href="#">U.S. EPA 1994a</a> )	Number of Workers	N/A – GS	
( <a href="#">CARB 2000</a> )	Market Penetration Data	High	Aerosol Degreasing and Aerosol Lubricants
( <a href="#">DLI/NCA 2017</a> )	Market Penetration Data	High	Dry Cleaning

### 2.4.1.3 Inhalation Exposures Approach and Methodology

To assess inhalation exposure, EPA reviewed exposure monitoring data identified through the systematic review process (described in Section 1.5) and monitoring data provided to EPA by other government agencies (e.g., OSHA and DOD) and mapped them to specific conditions of use. Monitoring data used in the occupational exposure assessment include data collected by government agencies such as OSHA and NIOSH, and data found in published literature. For each exposure scenario and worker job category (“worker” or “occupational non-user”), where available, EPA provided results representative of *central tendency* and *high-end* exposure levels. For datasets with six or more data points, central tendency and high-end exposures were estimated using the 50<sup>th</sup> and 95<sup>th</sup> percentile value from the observed dataset, respectively. For datasets with three to five data points, the central tendency and high-end exposures were estimated using the median and maximum values. For datasets with two data points, the midpoint and the maximum value were presented. Finally, datasets with only one data point were presented as-is. For datasets including exposure data that were reported as below the limit of detection (LOD), EPA estimated the exposure concentrations for these data, following guidance in

2719 EPA's *Guidelines for Statistical Analysis of Occupational Exposure Data* ([U.S. EPA 1994b](#))<sup>11</sup>. A dataset  
2720 comprises the combined exposure monitoring data from all studies applicable to that condition of use.

2721  
2722 For exposure assessment, personal breathing zone (PBZ) monitoring data were used to determine the  
2723 time-weighted average (TWA) exposure concentration. The lone exception to this is exposures from  
2724 mold release products (assessed in "Other Commercial Uses") where the assessment was made with area  
2725 monitoring data as PBZ data were not available. TWA exposure concentrations are then used to  
2726 calculate the Acute Concentration (AC) used for estimating acute risks (i.e., risks associated from a  
2727 single day or 24-hr of exposure); Average Daily Concentrations (ADC) used for estimating chronic,  
2728 non-cancer risks; and Lifetime Average Daily Concentration (LADC) used for estimating chronic cancer  
2729 risks. AC, ADC, and LADC are calculated using the approach and equations described in Appendix B  
2730 and C of the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene*  
2731 (*Ethene, 1,1,2,2,-Tetrachloro*) CASRN: 127-18-4 (Supplemental Engineering Report) ([U.S. EPA 2020d](#)).  
2732 Table 2-14 presents the confidence rating of monitoring data that EPA used to assess occupational  
2733 exposures. EPA evaluated monitoring data using the evaluation strategies laid out in the *Application of*  
2734 *Systematic Review in TSCA Risk Evaluations* ([U.S. EPA 2018b](#)). All exposure monitoring data used in  
2735 the assessment have a "high" or "medium" confidence rating.

2736  
2737 EPA also presented TWA concentrations based on shorter averaging times (e.g., 15-min, 30-min, 1-hr,  
2738 and 4-hr) in addition to full-shift (either 8- or 12-hour) TWAs for several conditions of use. Short-term  
2739 TWAs are only presented where data were available to do so. EPA's primary concern for this  
2740 assessment were full-shift exposures; therefore, no effort was made to estimate shorter-term exposure  
2741 values where data were not reasonably available. AC, ADC, and LADC values are only calculated based  
2742 on the full-shift (8- or 12-hr TWAs) as full-shift data represent the closest approximation to a worker's  
2743 exposure for a full day (i.e., 24-hr), assuming no exposure once the worker leaves the job site. The full-  
2744 shift exposure results can then be averaged over 24 hours, working years, or lifetime years to estimate  
2745 AC, ADC, and LADC, respectively. Short-term data may not be representative of a full day's exposure,  
2746 thus, underestimating AC, ADC, and LADC results.

2747  
2748 For several conditions of use, EPA modeled exposure in occupational settings. The models were used to  
2749 either supplement existing exposure monitoring data or to provide exposure estimates where measured  
2750 data are unavailable. The use of modeling to supplement existing exposure monitoring data was  
2751 primarily used to aid EPA's understanding of the monitoring data's representativeness of actual  
2752 exposures within the condition of use. For example, where model results and monitoring data are  
2753 similar, it helps corroborate the representativeness of the data to actual exposures. When determining  
2754 unreasonable risks for scenarios with both monitoring data and modeling, EPA generally uses  
2755 monitoring data results over modeling unless the data quality score for the monitoring data is low, or  
2756 there were limited number of data points for the scenario such that the representativeness of the data is  
2757 limited. Where measured monitoring data and models were not available, EPA estimated exposures  
2758 using values from GSs and ESDs. A summary of approaches and EPA's overall confidence in the  
2759 exposure estimates are provided in Table 2-14.

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<sup>11</sup> Using the  $\frac{LOD}{\sqrt{2}}$  if the geometric standard deviation of the data is less than 3.0 and  $\frac{LOD}{2}$  if the geometric standard deviation is 3.0 or greater.

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**Table 2-14. Data Evaluation of Sources Containing Occupational Exposure Monitoring Data**

Source Reference	Data Type	Data Quality Rating	Condition of Use
( <a href="#">HSIA 2018a</a> )	PBZ Monitoring	High	Manufacturing; Processing as a Reactant
( <a href="#">Dow Chem 1984</a> )	PBZ Monitoring	Medium	Repackaging
( <a href="#">Orris and Daniels 1981</a> )	PBZ Monitoring	High	Incorporation into Formulation, Mixture, or Reaction Product (Aerosol Packing Only)
( <a href="#">Gorman et al. 1984</a> )	PBZ Monitoring	Medium	OTVD
( <a href="#">Ruhe 1982</a> )	PBZ Monitoring	Medium	OTVD
( <a href="#">NIOSH 2002b</a> )	PBZ Monitoring	High	OTVD
( <a href="#">NIOSH 2002d</a> )	PBZ Monitoring	High	OTVD
( <a href="#">NIOSH 2002a</a> )	PBZ Monitoring	High	OTVD; Closed-Loop Vapor Degreasing
( <a href="#">NIOSH 2002c</a> )	PBZ Monitoring	High	Closed-Loop Vapor Degreasing; Cold Cleaning
( <a href="#">Vulcan 1994</a> )	PBZ Monitoring	High	Cold Cleaning
( <a href="#">U.S. DOD and Environmental Health Readiness System - Industrial 2018</a> )	PBZ Monitoring	High	Aerosol Degreasing and Aerosol Lubricants; Dry Cleaning and Spot Cleaning; Adhesives, Sealants, Paints, and Coatings (Paints and Coatings Only); Chemical Maskant; Other DoD Uses
( <a href="#">Cosgrove and Hygiene 1994</a> )	PBZ Monitoring	High	Aerosol Degreasing and Aerosol Lubricants
( <a href="#">Vulcan 1992</a> )	PBZ Monitoring	High	Aerosol Degreasing and Aerosol Lubricants
( <a href="#">Vulcan 1993</a> )	PBZ Monitoring	High	Aerosol Degreasing and Aerosol Lubricants
( <a href="#">OSHA 2017</a> )	PBZ Monitoring	High	Dry Cleaning and Spot Cleaning
( <a href="#">NIOSH 1995</a> )	PBZ Monitoring	High	Dry Cleaning and Spot Cleaning

Source Reference	Data Type	Data Quality Rating	Condition of Use
( <a href="#">Burroughs 1999a</a> )	PBZ Monitoring	High	Dry Cleaning and Spot Cleaning
( <a href="#">Burroughs 1999b</a> )	PBZ Monitoring	High	Dry Cleaning and Spot Cleaning
( <a href="#">Burroughs 1999b</a> )	PBZ Monitoring	High	Dry Cleaning and Spot Cleaning
( <a href="#">Burroughs 2000</a> )	PBZ Monitoring	High	Dry Cleaning and Spot Cleaning
( <a href="#">NIOSH 2000</a> )	PBZ Monitoring	High	Dry Cleaning and Spot Cleaning
( <a href="#">Gromiec et al. 2002</a> )	PBZ Monitoring	Medium	Adhesives, Sealants, Paints, and Coatings (Adhesives Only)
( <a href="#">Chrostek and Levine 1981</a> )	PBZ Monitoring	High	Adhesives, Sealants, Paints, and Coatings (Paints and Coatings Only)
( <a href="#">Stephenson and Albrecht 1986</a> )	PBZ Monitoring	High	Adhesives, Sealants, Paints, and Coatings (Paints and Coatings Only)
( <a href="#">Hanley 1993</a> )	PBZ Monitoring	Medium	Adhesives, Sealants, Paints, and Coatings (Paints and Coatings Only)
( <a href="#">Ford Motor 1981</a> )	PBZ Monitoring	Medium	Adhesives, Sealants, Paints, and Coatings (Paints and Coatings Only)
( <a href="#">Hervin et al. 1977</a> )	PBZ Monitoring	High	Chemical Maskant
( <a href="#">Dow Chem 1983b</a> )	PBZ Monitoring	Medium	Industrial Processing Aid
( <a href="#">Dow Chem 1983a</a> )	PBZ Monitoring	Medium	Industrial Processing Aid
( <a href="#">Dow Chem 1982</a> )	PBZ Monitoring	Medium	Industrial Processing Aid
( <a href="#">Dow Chem 1979</a> )	PBZ Monitoring	Medium	Industrial Processing Aid
( <a href="#">Gunter and Lybarger 1979</a> )	PBZ Monitoring	High	Wipe Cleaning and Metal/Stone Polishes
( <a href="#">Moody et al. 1983</a> )	PBZ Monitoring	High	Wipe Cleaning and Metal/Stone Polishes
( <a href="#">Burton and Monestersky 1996</a> )	PBZ Monitoring	High	Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)

Source Reference	Data Type	Data Quality Rating	Condition of Use
( <a href="#">Gold et al. 2008</a> )	Area Monitoring	High	Other Commercial Uses (Mold Release Only)
( <a href="#">NIOSH 1980</a> )	PBZ Monitoring	Medium	Other Commercial Uses (Printing Only)
( <a href="#">Apol 1981</a> )	PBZ Monitoring	High	Other Commercial Uses (Printing Only)
( <a href="#">Love 1982</a> )	PBZ Monitoring	High	Other Commercial Uses (Printing Only)
( <a href="#">Ruhe 1983</a> )	PBZ Monitoring	High	Other Commercial Uses (Printing Only)
( <a href="#">Gunter et al. 1984</a> )	PBZ Monitoring	High	Other Commercial Uses (Printing Only)
( <a href="#">Burotn 1994</a> )	PBZ Monitoring	Medium	Other Commercial Uses (Printing Only)
( <a href="#">Moseley 1980</a> )	PBZ Monitoring	Medium	Other Commercial Uses (Photographic Film Only)
( <a href="#">Stefaniak et al. 2000</a> )	PBZ Monitoring	High	Other Commercial Uses (Photocopying Only)

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2764 **Table 2-15. A Summary of Approaches and Overall Confidence for Exposures Estimates for Each**  
2765 **OES**

2766 Note: Where EPA was not able to estimate ONU inhalation exposure from monitoring data or models,  
2767 this was assumed equivalent to the central tendency experienced by workers for the corresponding OES;  
2768 dermal exposure for ONUs was not evaluated because they are not expected to be in direct contact with  
2769 PCE and data to model incidental exposures were not available.

Occupational Exposure Scenario (OES)	Inhalation Exposure									Dermal Exposure Modeling <sup>b</sup>	
	Monitoring					Modeling		Overall Confidence		Worker	ONU
	Monitoring Data	# Data Points <sup>a</sup>	Data Quality Rating	Worker	ONU	Worker	ONU	Worker	ONU		
Manufacturing	✓	152 <sup>c</sup>	H	✓	✗	✗	✗	H	L	✓	-
Repackaging	✓	10	M	✓	✗	✗	✗	M	L	✓	-
Processing as a Reactant	✓	152 <sup>d</sup>	H	✓	✗	✗	✗	H	L	✓	-



Occupational Exposure Scenario (OES)	Inhalation Exposure									Dermal Exposure Modeling <sup>b</sup>	
	Monitoring					Modeling		Overall Confidence			
	Monitoring Data	# Data Points <sup>a</sup>	Data Quality Rating	Worker	ONU	Worker	ONU	Worker	ONU	Worker	ONU
Incorporation into Formulation, Mixture, or Reaction Product (Aerosol Packing Only)	✓	5	H	✓	✗	✗	✗	H	L	✓	-
Incorporation into Formulation, Mixture, or Reaction Product (Non-Aerosol Packing Only)	✗	-	-	✗	✗	✓	✗	M	L	✓	-
Batch Open-Top Vapor Degreasing	✓	75	M to H	✓	✓	✗	✗	M to H	M to H	✓	-
Batch Closed-Loop Vapor Degreasing	✓	15	H	✓	✓	✗	✗	H	H	✓	-
Conveyorized Vapor Degreasing	✗	-	-	✗	✗	✓	✓	M	M	✓	-
Web Degreasing	✗	-	-	✗	✗	✓	✓	M	M	✓	-
Cold Cleaning	✓	29	H	✓	✗	✓	✓	M to H	M to H	✓	-
Aerosol Degreasing and Aerosol Lubricants	✓	130	H	✓	✗	✓	✓	H	H	✓	-
Dry Cleaning and Spot Cleaning	✓	140 <sup>e</sup>	H	✓	✓	✓	✓	H	H	✓	-
Adhesives, Sealants, Paints, and Coatings	✓	28 <sup>f</sup>	M; M to H <sup>g</sup>	✓	✗	✗	✗	M	L	✓	-
Maskant For Chemical Milling	✓	24	H	✓	✗	✗	✗	M to H	L	✓	-
Industrial Processing Aid	✓	89	M	✓	✗	✗	✗	M	L	✓	-

Occupational Exposure Scenario (OES)	Inhalation Exposure									Dermal Exposure Modeling <sup>b</sup>	
	Monitoring					Modeling		Overall Confidence			
	Monitoring Data	# Data Points <sup>a</sup>	Data Quality Rating	Worker	ONU	Worker	ONU	Worker	ONU	Worker	ONU
Metalworking Fluids <sup>h</sup>	x	-	-	x	x	x	x	M	L	✓	-
Wipe Cleaning and Metal/Stone Polishes	✓	10	H	✓	✓	x	x	M to H	M to H	✓	-
Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	✓	3	H	✓	✓	x	x	M	M	✓	-
Other Industrial Uses	x	-	-	x	x	✓	x	M	L	✓	-
Other Commercial Uses	✓	92 <sup>i</sup>	M to H; H; M; H <sup>j</sup>	✓	x	x	x	M to H; M	L	✓	-
Laboratory Chemicals	EPA did not identify data to assess this OES.									✓	-
Waste Handling, Disposal, Treatment, and Recycling	x	-	-	x	x	✓	x	M	L	✓	-
Other Department of Defense Uses	✓	2 <sup>k</sup>	H	✓	x	x	x	H	L	✓	-

2770 <sup>a</sup> This number only includes full-shift (8-hr and 12-hr TWAs) and does not include short-term samples (i.e., 15-min, 30-min, 2771 60-min, or 4-hr TWAs).  
 2772 <sup>b</sup> EPA has a medium level of confidence in its dermal exposure estimates which are based on high-end/central tendency  
 2773 parameters and commercial/industrial settings.  
 2774 <sup>c</sup> This count includes 75 8-hr TWA data points and 77 12-hr TWA data points.  
 2775 <sup>d</sup> The data for this OES are the same monitoring data from PCE manufacturing sites used as surrogate for sites processing  
 2776 PCE as a reactant.  
 2777 <sup>e</sup> This count includes 22 data points for the post-2006 NESHAP mix of machine generations and 118 data points for fourth  
 2778 and fifth generation machines only. See Section 2.4.1.16 for further discussion of the two data sets.  
 2779 <sup>f</sup> This count includes 13 data points for adhesives/sealants and 15 data points for paints/coatings.  
 2780 <sup>g</sup> For adhesives/sealants the data quality is M; for paints/coatings the data quality is M to H.  
 2781 <sup>h</sup> Exposure to metalworking fluids were assessed using estimates from an ESD.  
 2782 <sup>i</sup> This includes 23 data points for printing applications, 3 data points for photocopying, 62 data points for photographic film  
 2783 applications, and 4 for mold release products.  
 2784 <sup>j</sup> For printing applications the data quality is M to H; for photocopying the data quality is H; for photographic film  
 2785 applications the data quality is M; for mold release products the data quality is H.  
 2786 <sup>k</sup> This count includes one data point for oil analysis uses at DoD sites and one data point for water pipe repair uses at DoD  
 2787 sites.

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**2.4.1.4 Consideration of Engineering Controls and Personal Protective Equipment**

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OSHA and NIOSH recommend employers utilize the hierarchy of controls to address hazardous exposures in the workplace. The hierarchy of controls strategy outlines, in descending order of priority, the use of elimination, substitution, engineering controls, administrative controls, and lastly personal protective equipment (PPE). The hierarchy of controls prioritizes the most effective measures first which is to eliminate or substitute the harmful chemical (e.g., use a different process, substitute with a less hazardous material), thereby preventing or reducing exposure potential. Following elimination and substitution, the hierarchy recommends engineering controls to isolate employees from the hazard (e.g., source enclosure, local exhaust ventilation systems), followed by administrative controls (e.g. do not open machine doors when running), or changes in work practices (e.g., maintenance plan to check equipment to insure no leaks) to reduce exposure potential. Administrative controls are policies and procedures instituted and overseen by the employer to limit worker exposures. As the last means of control, the use of personal protective equipment (e.g., respirators, gloves) is recommended, when the other control measures cannot reduce workplace exposure to an acceptable level.

OSHA’s Respiratory Protection Standard (29 CFR § 1910.134) requires employers to address workplace hazards by implementing engineering control measures and, if these are not feasible, provide respirators that are applicable and suitable for the purpose intended. Respirator selection provisions are provided in § 1910.134(d) and require that appropriate respirators are selected based on the respiratory hazard(s) to which the worker will be exposed and workplace and user factors that affect respirator performance and reliability. Assigned protection factors (APFs) are provided in Table 1 under § 1910.134(d)(3)(i)(A) (see below in Table 2-16) and refer to the level of respiratory protection that a respirator or class of respirators is expected to provide to employees when the employer implements a continuing, effective respiratory protection program according to the requirements of OSHA’s Respiratory Protection Standard.

If respirators are necessary in atmospheres that are not immediately dangerous to life or health, workers must use NIOSH-certified air-purifying respirators or NIOSH-approved supplied-air respirators with the appropriate APF. Respirators that meet these criteria may include air-purifying respirators with organic vapor cartridges. Respirators must meet or exceed the required level of protection listed in Table 2-16. Based on the APF, inhalation exposures may be reduced by a factor of 5 to 10,000, if respirators are properly worn and fitted.

2822 **Table 2-16. Assigned Protection Factors for Respirators in OSHA Standard 29 CFR 1910.134**

Type of Respirator	Quarter Mask	Half Mask	Full Facepiece	Helmet/Hood	Loose-fitting Facepiece
1. Air-Purifying Respirator	5	10	50		
2. Power Air-Purifying Respirator (PAPR)		50	1,000	25/1,000	25
3. Supplied-Air Respirator (SAR) or Airline Respirator					
• Demand mode		10	50		
• Continuous flow mode		50	1,000	25/1,000	25
• Pressure-demand or other positive-pressure mode		50	1,000		
4. Self-Contained Breathing Apparatus (SCBA)					
• Demand mode		10	50	50	
• Pressure-demand or other positive-pressure mode (e.g., open/closed circuit)			10,000	10,000	

2823 Source: 29 CFR § 1910.134(d)(3)(i)(A)

2824 The National Institute for Occupational Safety and Health (NIOSH) and the U.S. Department of Labor’s  
 2825 Bureau of Labor Statistics (BLS) conducted a voluntary survey of U.S. employers regarding the use of  
 2826 respiratory protective devices between August 2001 and January 2002 ([NIOSH 2001b](#)). Results of the  
 2827 survey include the number and percent of establishments and employees using respirators within 12  
 2828 months prior to the survey. For additional information, please also refer to  
 2829 [Memorandum\_NIOSH\_BLS Respirator Usage in Private Sector Firms, Docket: TBD].

2830 The plausibility of regular respirator use by workers was considered on an OES-specific basis. See Table  
 2831 4-3 for determinations of whether respirator use was assumed for each OES during risk characterization.

2832 **2.4.1.5 Dermal Exposure Assessment Approach**

2833 Dermal exposure data was not readily available for the conditions of use in the assessment. Because  
 2834 PCE is a volatile liquid that readily evaporates from the skin, EPA estimated dermal exposures using the  
 2835 *Dermal Exposure to Volatile Liquids Model*. This model determines a dermal potential dose rate based  
 2836 on an assumed amount of liquid on skin during one contact event per day and the steady-state fractional  
 2837 absorption for PCE based on a theoretical framework provided by Kasting ([2006](#)). The amount of liquid  
 2838 on the skin is adjusted by the weight fraction of PCE in the liquid to which the worker is exposed.  
 2839 Specific details of the dermal exposure assessment can be found in Section 2.4.1.29 and equations and  
 2840 sample calculations for estimate dermal exposures can be found in Appendix K of the *Assessment of*  
 2841 *Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-*  
 2842 *Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)).

2843 **2.4.1.6 Manufacturing**

2844 **Worker Activities**

2845 During manufacturing, workers are potentially exposed while connecting and disconnecting hoses and  
 2846 transfer lines to containers and packaging to be loaded with PCE product (e.g., railcars, tank trucks,

totes, drums, bottles) and intermediate storage vessels (e.g., storage tanks, pressure vessels). Workers near loading racks and container filling stations are potentially exposed to fugitive emissions from equipment leaks and displaced vapor as containers are filled. These activities are potential sources of worker exposure through dermal contact with liquid and inhalation of vapors.

ONUs include employees that work at the site where PCE is manufactured, but they do not directly handle the chemical and therefore are assumed to have lower inhalation exposures, and are not assumed to have dermal exposures. ONUs for manufacturing include supervisors, managers, and tradesmen that may be in the manufacturing area but do not perform tasks that result in the same level of exposures as manufacturing workers.

### Number of Workers and Occupational Non-Users

To determine the number of workers, EPA used the average of the ranges reported in the 2016 CDR for four sites where data were available and worker and ONUs estimates from the BLS analysis for the other four sites (see the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) (U.S. EPA 2020d) for number of sites estimate). For the BLS analysis EPA used the NAICS code 325199—All Other Basic Organic Chemical Manufacturing to estimate workers and ONUs. CDR data do not differentiate between workers and ONUs; therefore, EPA assumed the ratio of workers to ONUs would be similar as determined in the BLS data where approximately 68% of the exposed personnel are workers and 32% are ONUs (U.S. BLS 2016). This resulted in approximately 640 workers and 300 ONUs (see Table 2-17).

**Table 2-17. Estimated Number of Workers Potentially Exposed to PCE During Manufacturing**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
8	80	38	640	300	940

<sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

### Occupational Inhalation Exposure Results

Table 2-18 summarizes 15-min, 30-min, 8-hr, and 12-hr TWA exposure results for manufacturing. The high-ends are the 95<sup>th</sup> percentile of the respective data sets and the central tendencies are the 50<sup>th</sup> percentile. EPA assessed exposures using data submitted for three companies by the Halogenated Solvent Industry Alliance (HSIA) (HSIA 2018a). It should be noted that approximately 65% of the 8-hr TWA exposure data, 73% of the 12-hr TWA exposure data, 24% of the 15-min TWA exposure data, and 55% of the 30-min TWA exposure data were below the limit of detection (LOD). To estimate exposure concentrations for these data, EPA followed the *Guidelines for Statistical Analysis of Occupational Exposure Data* (U.S. EPA 1994b) as discussed in Section 2.4.1.3. The geometric standard deviation for the 8-hr TWA data, 12-hr TWA data, and 15-min TWA were all above 3.0; therefore, EPA used the  $\frac{LOD}{2}$  to estimate the exposure value as specified in the guidelines (U.S. EPA 1994b). The geometric standard deviation for the 30-min TWA was below 3.0; therefore, EPA used the  $\frac{LOD}{\sqrt{2}}$  to estimate the exposure value as specified in the guidelines (U.S. EPA 1994b). Because over 50% of the data are below the LOD for the 8-hr, 12-hr, and 30-min TWA data, calculating statistics from this data does present the potential

2887 to introduce biases into the results. Estimation of exposure values for results below the LOD may over-  
2888 or under-estimate actual exposure thus skewing the calculated statistics higher or lower, respectively.  
2889 The overall directional bias of the exposure assessment, accounting for both the overestimate and  
2890 underestimate, is not known.

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2892 It should also be noted that 18 8-hr TWA exposure data points and 5 30-min TWA data points from  
2893 Company C were not included in the results as they were reported as being below the detection limit, but  
2894 the company did not provide the value of the LOD. Therefore, EPA could not estimate a value for these  
2895 data using the guidelines described above. Data were not available to estimate ONU exposures; EPA  
2896 estimates that ONU exposures are lower than worker exposures, since ONUs do not typically directly  
2897 handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency exposure results  
2898 as a surrogate to estimate exposures for ONUs.  
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2900

**Table 2-18. Summary of Inhalation Monitoring Data for the Manufacture of PCE**

Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)			
8-hr TWA Exposure Concentration	3.3E-02	2.6	75 <sup>b</sup>	3.3E-02	High
Acute Exposure Concentration (AC) based on 8-hr TWA	1.1E-02	0.9		1.1E-02	
Average Daily Concentration (ADC) based on 8-hr TWA	7.4E-03	0.6		7.4E-03	
Lifetime Average Daily Concentration (LADC) based on 8-hr TWA	2.9E-03	0.3		2.9E-03	
12-hr TWA Exposure Concentration	2.1E-02	0.2	77	2.1E-02	
Acute Exposure Concentration (AC) based on 12-hr TWA	1.0E-02	0.1		1.0E-02	
Average Daily Concentration (ADC) based on 12-hr TWA	7.0E-03	7.3E-02		7.0E-03	
Lifetime Average Daily Concentration (LADC) based on 12-hr TWA	2.8E-03	3.7E-02		2.8E-03	
15-min TWA Exposure Concentration	2.0	15	161	2.0	
30-min TWA Exposure Concentration	0.7	12	38 <sup>c</sup>	0.7	

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AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.  
<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.  
<sup>b</sup> Data does not include 18 data points that were reported as being below the detection limit, but for which the company did not provide the LOD for use in estimating an exposure value.  
<sup>c</sup> Data does not include five data points that were reported as being below the detection limit, but for which the company did not provide the LOD for use in estimating an exposure value.  
 Sources: ([HSIA 2018a](#))

**Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

Exposure to workers is assessed using PCE personal breathing zone monitoring data collected at workplaces directly applicable to this condition of use, and the data were determined to have a “high” confidence rating through EPA’s systematic review process. Specifically, the data were determined to be highly representative in geographic scope and reflective of current operations. The source also provides metadata including sample type and sample duration.

The data includes exposure concentrations for a variety of worker tasks at each of the three manufacturing facilities from which the data were obtained. It is not known whether these data points would also be representative of the worker exposure level at other domestic manufacturing facilities. Despite this uncertainty, EPA has a high level of confidence in the assessed worker exposures based on the strength of the monitoring data.

Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is expected to be lower than that of workers as EPA expects ONUs to be farther from the source of exposure than workers. Therefore, EPA's confidence in the exposure estimate for ONUs is low.

#### 2.4.1.7 Repackaging

##### Worker Activities

During repackaging, workers are potentially exposed while connecting and disconnecting hoses and transfer lines to containers and packaging to be unloaded (e.g., railcars, tank trucks, totes), intermediate storage vessels (e.g., storage tanks, pressure vessels), and final packaging containers (e.g., drums, bottles). Workers near loading racks and container filling stations are potentially exposed to fugitive emissions from equipment leaks and displaced vapor as containers are filled. These activities are potential sources of worker exposure through dermal contact with liquid and inhalation of vapors.

ONUs include employees that work at the site where PCE is repackaged, but they do not directly handle the chemical and are therefore expected to have lower inhalation exposures and are not expected to have dermal exposures. ONUs for repackaging include supervisors, managers, and tradesmen that may be in the repackaging area but do not perform tasks that result in the same level of exposures as repackaging workers.

##### Number of Workers and Occupational Non-Users

EPA estimated the number of workers and occupational non-users potentially exposed during repackaging of PCE using Bureau of Labor Statistics' OES data ([U.S. BLS 2016](#)) and the U.S. Census' SUSB ([U. S. Census Bureau 2015](#)) as well as the primary NAICS and SIC code reported by each site in the 2016 TRI or 2016 DMR, respectively (see the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate). This resulted in approximately 210 workers and 75 ONUs potentially exposed during repackaging of PCE (see Table 2-19).

**Table 2-19. Estimated Number of Workers Potentially Exposed to PCE During Repackaging**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
51	4	1	210	75	280

<sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

##### Occupational Inhalation Exposure Results

EPA assessed inhalation exposures during import/repackaging using identified monitoring data. Table 2-20 summarizes 15-min, 30-min, and 8-hr TWA results obtained from data submitted to EPA by Dow Chemical under TSCA ([Dow Chem 1984](#)). For the 8-hr TWA results the 95<sup>th</sup> percentile and 50<sup>th</sup>



percentiles are presented as the high-end and central tendency exposure values, respectively. For the 15-min TWA, only two data points were available; therefore, EPA presents two scenarios: 1) using the maximum as a “higher value”; and 2) using the midpoint as a “midpoint value”. For the 30-min TWA, only five data points were available; therefore, the maximum is presented as the high-end and the median is presented as the central tendency. It should be noted that two of the 30-min TWA samples measured below the LOD ([Dow Chem 1984](#)). To estimate exposure concentrations for these data, EPA followed the *Guidelines for Statistical Analysis of Occupational Exposure Data* (1994) as discussed in Section 2.4.1.3. The geometric standard deviation for was above 3.0; therefore, EPA used the  $\frac{LOD}{2}$  to estimate the exposure value as specified in the guidelines ([U.S. EPA 1994b](#)). Data were not available to estimate ONU exposures; EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not typically directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs.

**Table 2-20. Summary of Inhalation Monitoring Data for Repackaging**

Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)			
8-hr TWA Exposure Concentration	0.4	0.8	10	0.4	Medium
Acute Exposure Concentration (AC)	0.1	0.3		0.1	
Average Daily Concentration (ADC)	9.9E-02	0.2		9.9E-02	
Lifetime Average Daily Concentration (LADC)	3.9E-02	9.6E-02		3.9E-02	
15-min TWA Exposure Concentration <sup>b</sup>	0.9	1.6	2	0.9	
30-min TWA Exposure Concentration	8.0E-02	5.7	5	8.0E-02	

AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

<sup>b</sup> Due to only two data points identified, EPA presents two scenarios: 1) using the higher of the two values; and 2) using the midpoint of the two values.

Sources: ([Dow Chem 1984](#))

### Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment

Exposure to workers is assessed using PCE personal breathing zone monitoring data collected at one repackaging facility. The data were determined to have a “medium” confidence rating through EPA’s systematic review process. However, the data may not be representative of exposures across other repackaging facilities (e.g., those repackaging from and into different container sizes than the used in the identified data). Based on reasonably information above, EPA has a medium level of confidence in the assessed worker exposure.

2990 Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical  
 2991 representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is  
 2992 expected to be lower than that of workers as EPA expects ONUs to be farther from the source of  
 2993 exposure than workers. Therefore, EPA’s confidence in the exposure estimate for ONUs is low.

2994 **2.4.1.8 Processing as a Reactant**

2995 **Worker Activities**

2996 At industrial facilities, workers are potentially exposed when unloading PCE from transport containers  
 2997 into intermediate storage tanks and process vessels. Workers may be exposed via inhalation of vapor or  
 2998 via dermal contact with liquids while connecting and disconnecting hoses and transfer lines. Once PCE  
 2999 is unloaded into process vessels, it is consumed as a chemical intermediate.

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 3001 ONUs are employees who work at the facilities that process and use PCE, but who do not directly  
 3002 handle the material. ONUs may also be exposed to PCE but are expected to have lower inhalation  
 3003 exposures and are not expected to have dermal exposures. ONUs for this condition of use may include  
 3004 supervisors, managers, engineers, and other personnel in nearby production areas.

3005  
 3006 **Number of Workers and Occupational Non-Users**

3007 EPA estimated the number of workers and occupational non-users potentially exposed during processing  
 3008 of PCE as a reactant using Bureau of Labor Statistics’ OES data ([U.S. BLS 2016](#)) and the U.S. Census’  
 3009 SUSB ([U. S. Census Bureau 2015](#)) as well as the primary NAICS and SIC code reported by each site in  
 3010 the 2016 TRI or 2016 DMR, respectively (see the *Assessment of Occupational Exposure and*  
 3011 *Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4*  
 3012 (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate). This resulted in  
 3013 approximately 4,200 workers and 1,900 ONUs potentially exposed during processing of PCE as a  
 3014 reactant (see Table 2-21).

3015  
 3016 **Table 2-21. Estimated Number of Workers Potentially Exposed to PCE During Processing as a**  
 3017 **Reactant**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed ONUs <sup>a</sup>	Total Exposed <sup>a</sup>
117	36	17	4,200	1,900	6,100

3018 <sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.  
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3020 **Occupational Inhalation Exposure Results**

3021 EPA did not identify any inhalation monitoring data to assess exposures during processing PCE as a  
 3022 reactant. EPA assumes that potential sources of exposure at sites using PCE as a reactant are similar to  
 3023 sites manufacturing raw PCE. Therefore, EPA assessed inhalation exposures during processing PCE as a  
 3024 reactant using monitoring data from manufacturing sites as a surrogate for sites processing PCE as a  
 3025 reactant. The results from the surrogate inhalation monitoring data are provided in Table 2-22.  
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**Table 2-22. Summary of Inhalation Monitoring Results for Processing PCE as a Reactant<sup>a</sup>**

Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>b</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)			
8-hr TWA Exposure Concentration	3.3E-02	2.6	75 <sup>c</sup>	3.3E-02	High
Acute Exposure Concentration (AC) based on 8-hr TWA	1.1E-02	0.9		1.1E-02	
Average Daily Concentration (ADC) based on 8-hr TWA	7.4E-03	0.6		7.4E-03	
Lifetime Average Daily Concentration (LADC) based on 8-hr TWA	2.9E-03	0.3		2.9E-03	
12-hr TWA Exposure Concentration	2.1E-02	0.2	77	2.1E-02	
Acute Exposure Concentration (AC) based on 12-hr TWA	1.0E-02	0.1		1.0E-02	
Average Daily Concentration (ADC) based on 12-hr TWA	7.0E-03	7.3E-02		7.0E-03	
Lifetime Average Daily Concentration (LADC) based on 12-hr TWA	2.8E-03	3.7E-02		2.8E-03	
15-min TWA Exposure Concentration	2.0	15	161	2.0	
30-min TWA Exposure Concentration	0.7	12	38 <sup>d</sup>	0.7	

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AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

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<sup>a</sup> These results are based on monitoring data from PCE manufacturing used as surrogate for sites processing PCE as a reactant.

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<sup>b</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

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<sup>c</sup> Data does not include 18 data points that were reported as being below the detection limit, but for which the company did not provide the LOD for use in estimating an exposure value.

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<sup>d</sup> Data does not include five data points that were reported as being below the detection limit, but for which the company did not provide the LOD for use in estimating an exposure value.

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Sources: ([HSIA 2018a](#))

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**Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

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Exposure to workers is assessed using PCE personal breathing zone monitoring data collected at facilities manufacturing PCE as a surrogate for facilities processing PCE as reactant. The data were determined to have a “high” confidence rating through EPA’s systematic review process. Although these data are not directly applicable to processing of PCE as a reactant, EPA expects a high degree of overlap of worker tasks at both manufacturing sites and sites processing PCE as a reactant. Based on this expectation and the strength of the monitoring data, EPA has a medium to high level of confidence in the assessed worker exposures.

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3049 Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical  
 3050 representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is  
 3051 expected to be lower than that of workers as EPA expects ONUs to be farther from the source of  
 3052 exposure than workers. Therefore, EPA's confidence in the exposure estimate for ONUs is low.

### 2.4.1.9 Incorporation into Formulation, Mixture, or Reactant Product

#### Worker Activities

3054 At formulation facilities, workers are potentially exposed when unloading PCE into mixing vessels,  
 3055 taking QC samples, and packaging formulated products into containers and tank trucks. The exact  
 3056 activities and associated level of exposure will differ depending on the degree of automation, presence  
 3057 of engineering controls, and use of PPE at each facility.  
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#### Number of Workers and Occupational Non-Users

3060 EPA estimated the number of workers and occupational non-users potentially exposed during  
 3061 formulation of PCE-containing products using Bureau of Labor Statistics' OES data ([U.S. BLS 2016](#))  
 3062 and the U.S. Census' SUSB ([U. S. Census Bureau 2015](#)) as well as the primary NAICS and SIC code  
 3063 reported by each site in the 2016 TRI or 2016 DMR, respectively (see the *Assessment of Occupational*  
 3064 *Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN:*  
 3065 *127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate). This  
 3066 resulted in approximately 800 workers and 310 ONUs potentially exposed during formulation of PCE-  
 3067 containing products (see Table 2-23).  
 3068

3070 **Table 2-23. Estimated Number of Workers Potentially Exposed to PCE During Formulation**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
39	21	8	800	310	1,100

3071 <sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.  
 3072

#### Occupational Inhalation Exposure Results

3074 EPA identified inhalation exposure monitoring data related to the aerosol packing of PCE-containing  
 3075 products ([Orris and Daniels 1981](#)). However, no monitoring data was identified for other formulation  
 3076 sites and it is unlikely aerosol packing is representative of other formulation sites where workers are  
 3077 exposed during unloading of bulk containers (i.e., tank trucks and rail cars) and loading of formulated  
 3078 products into smaller containers (e.g., drums). Therefore, EPA used the monitoring data to assess  
 3079 exposures at aerosol packing facilities and the *EPA/OAQPS AP-42 Loading Model*, *EPA/OPPT Mass*  
 3080 *Balance Model* and Monte Carlo analysis to assess exposures at other non-aerosol packing facilities.  
 3081 Details of the model design and parameters is provided in Appendix F of the *Assessment of*  
 3082 *Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-*  
 3083 *Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)).  
 3084

3085 Table 2-24 summarizes 8-hr TWA PBZ monitoring data for aerosol packing formulation sites. Due to  
 3086 the limited number of data points (five), EPA used the maximum value as the high-end and the 50<sup>th</sup>  
 3087 percentile as the central tendency. Data were not available to estimate short-term or ONU exposures;  
 3088 EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not typically  
 3089 directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency exposure  
 3090 results as a surrogate to estimate exposures for ONUs.

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3092  
3093**Table 2-24. Summary of Inhalation Exposure Monitoring Data for Aerosol Packing Formulation Sites**

Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)			
8-hr TWA Exposure Concentration	8.3	13	5	8.3	High
Acute Exposure Concentration (AC)	2.8	4.4		2.8	
Average Daily Concentration (ADC)	1.9	3.0		1.9	
Lifetime Average Daily Concentration (LADC)	0.8	1.5		0.8	

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AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

Sources: ([Orris and Daniels 1981](#))

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The modeling approach used to assess exposures at non-aerosol packing formulation sites estimates exposures to workers loading formulated PCE-based products into 55-gallon drums. Inhalation exposure to chemical vapor during loading is a function of physical properties of PCE, various EPA default constants, and other model parameters. While physical properties are fixed for a substance, some model parameters, such as weight fraction of PCE in the product, ventilation rate, mixing factor, and vapor saturation factor, are expected to vary from one facility to another. This approach addresses variability for these parameters using a Monte Carlo analysis.

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The modeling approach requires an input on the number of containers loaded per day which is determined based on the throughput of PCE at each site and the weight fraction of PCE in the product. To determine these values EPA divided each site identified in Section 2.2.1.2.2 into one of the following categories: 1) sites formulating degreasing solvents; 2) sites formulating dry cleaning solvents, and 3) sites formulating “miscellaneous” PCE-containing products, including coatings, adhesives, metalworking fluids, and other niche use PCE-based products. The three categories were selected based on available market data from HSIA ([2008](#)), where the first two categories (degreasing and dry cleaning formulation) had market information indicating the percentage of the production volume used in those types of products. The HSIA ([2008](#)) market data did not include detailed production volume data for the third group so EPA could not divide the PCE production volume amongst the product types to calculate per site throughputs. Therefore, EPA assessed as a single category.

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Table 2-25 summarizes model results for workers at non-aerosol packing formulation sites with the 50<sup>th</sup> percentile presented as the central tendency and the 95<sup>th</sup> percentile presented as the high-end. Data were not available to incorporate ONU exposures into the model. EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not typically directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs.

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**Table 2-25. Summary of Exposure Modeling Results for Formulation of PCE-Based Products**

Formulation Type	Exposure Concentration Type	Worker Exposures		Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
		Central Tendency (ppm)	High-End (ppm)		
Degreasing Solvent	8-hr TWA Exposure Concentration	0.7	2.6	0.7	N/A – modeled data
	Acute Exposure Concentration (AC)	0.1	0.4	0.1	
	Average Daily Concentration (ADC)	1.6E-02	5.7E-02	1.6E-02	
	Lifetime Average Daily Concentration (LADC)	2.3E-03	8.4E-03	2.3E-03	
Dry Cleaning Solvent	8-hr TWA Exposure Concentration	4.0	14	4.0	
	Acute Exposure Concentration (AC)	0.6	2.1	0.6	
	Average Daily Concentration (ADC)	8.6E-02	0.3	8.6E-02	
	Lifetime Average Daily Concentration (LADC)	1.3E-02	4.5E-02	1.3E-02	
Miscellaneous	8-hr TWA Exposure Concentration	0.4	1.4	0.4	
	Acute Exposure Concentration (AC)	5.9E-02	0.2	5.9E-02	
	Average Daily Concentration (ADC)	8.6E-03	3.1E-02	8.6E-03	
	Lifetime Average Daily Concentration (LADC)	1.3E-03	4.5E-03	1.3E-03	

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AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

**Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

Exposure to workers at aerosol packing formulation sites is assessed using PCE personal breathing zone monitoring data collected at workplaces directly applicable to this condition of use, and the data were

3136 determined to have a “high” confidence rating through EPA’s systematic review process. Specifically,  
3137 the data were determined to be highly reliable, representative in geographic scope and reflective of  
3138 current operations. The source also provides metadata including sample type and sample duration. The  
3139 data includes exposure at a single aerosol packing facility. It is not known whether these data points  
3140 would also be representative of the worker exposure level at other similar facilities. Despite this  
3141 uncertainty, EPA has a high level of confidence in the assessed worker exposures based on the strength  
3142 of the monitoring data.

3143  
3144 The *EPA/OAQPS AP-42 Loading Model* and *EPA/OPPT Mass Balance Model* are used to estimate  
3145 worker exposures for non-aerosol packing facilities. The model uses a Monte Carlo analysis to  
3146 incorporate variability in the model input parameters. EPA believes the model exposures are likely to be  
3147 representative of worker exposure associated with loading 55-gallon drums. However, it assumes all  
3148 products are loaded into drums and does not consider the potential for loading of products into smaller  
3149 containers instead of or in addition to drums.

3150  
3151 The model also does not consider worker exposure from unloading raw PCE from bulk containers (i.e.  
3152 tank trucks or railcars). Although EPA can estimate exposures during this unloading activity using the  
3153 *Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model*, it is unclear if  
3154 the same workers will perform both unloading and loading activities in the same day. Therefore, it may  
3155 not be accurate to combine estimates from each model to estimate a total exposure. In the case where a  
3156 worker is both unloading bulk containers and loading products into drums on the same day, the overall  
3157 error from not including exposures during unloading in the results is expected to be small as the Tank  
3158 Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model estimates an 8-hr  
3159 TWA exposure of 0.01 ppm for tank truck unloading and an 8-hr TWA of 0.04 ppm for railcar  
3160 unloading whereas the model for drum loading estimates 8-hr TWAs ranging from 0.60 to 14.1 ppm.

3161  
3162 Furthermore, loading activities may be only a small part of the worker’s day. The model does not  
3163 account for other potential sources of exposure at industrial facilities, such as sampling, equipment  
3164 cleaning, and other process activities that can contribute to a worker’s overall 8-hr daily exposure. These  
3165 model uncertainties could result in an underestimate of the worker 8-hr exposure. Based on reasonably  
3166 available information above, EPA has a medium level of confidence in the assessed worker exposure.

3167  
3168 Exposure to ONUs at both aerosol packing and non-aerosol packing facilities is assessed using the  
3169 worker central tendency exposure values from the respective facility types. The statistical  
3170 representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is  
3171 expected to be lower than that of workers as EPA expects ONUs to be farther from the source of  
3172 exposure than workers. Therefore, EPA’s confidence in the exposure estimate for ONUs is low.

#### 3173 **2.4.1.10 Batch Open-Top Vapor Degreasing**

##### 3174 **Worker Activities**

3175 When operating OTVD, workers manually load or unload fabricated parts directly into or out of the  
3176 vapor cleaning zone. Worker exposure can occur from solvent dragout or vapor displacement when the  
3177 substrates enter or exit the equipment, respectively ([Kanegsberg and Kanegsberg 2011](#)). The amount of  
3178 time a worker spends at the vapor degreaser can vary depending on the number of workloads needed to  
3179 be cleaned. Reports from NIOSH at three sites using OTVDs found degreaser operators may spend 0.5  
3180 to 2 hours per day at the degreaser ([NIOSH 2002a, b, d](#)).

Worker exposure is also possible while charging new solvent or disposing spent solvent. The frequency of solvent charging can vary greatly from site-to-site and is dependent on the type, size, and amount of parts cleaned in the degreaser. NIOSH investigations found that one site added a 55-gallon drum of new solvent to the degreaser unit every one to two weeks; another site added one 55-gallon drum per month; and another site added two 55-gallon drums per month to its large degreaser and three 55 gallon drums per year to its small degreaser ([NIOSH 2002a, b, d](#)).

EPA defined ONU as an employee who does not regularly handle PCE or operate the degreaser but performs work in the area around the degreaser.

**Number of Workers and Occupational Non-Users**

EPA estimated the number of workers and occupational non-users potentially exposed during use of PCE in OTVDs using the Draft ESD on the Use of Vapor Degreasers ([OECD 2017a](#)). The ESD estimates seven workers and four ONUs per site ([OECD 2017a](#)). EPA multiplied these values by the number of sites estimated in the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)). This resulted in approximately 2,800 workers and 1,600 ONUs using the number of sites estimated from the 95<sup>th</sup> percentile use-rate and 35,000 workers and 20,000 ONUs using the number of sites estimated from the 50<sup>th</sup> percentile use-rate. Table 2-26 summarizes these results. Note: These are bounding estimates and may overestimate actual number of workers.

**Table 2-26. Estimated Number of Workers Potentially Exposed to PCE During Use in Open-Top Vapor Degreasing**

Use-Rate Scenario	Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
95 <sup>th</sup> Percentile	398	7	4	2,800	1,600	4,400
50 <sup>th</sup> Percentile	4,942	7	4	35,000	20,000	54,000

<sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

**Occupational Inhalation Exposure Results**

Table 2-27 summarizes the 8-hr TWA monitoring data, 4-hr TWA monitoring data, and 15-minute TWA monitoring data for the use of PCE in OTVDs. The high-end and central tendency values for the 8-hr TWA data represent the 95<sup>th</sup> and 50<sup>th</sup> percentile, respectively. Due to the limited number of data points (three samples), the 4-hr TWA high-end is the maximum value and the central tendency is the 50<sup>th</sup> percentile. There is only a single 15-min TWA sample.

EPA recognizes that worker job titles and activities may vary significantly from site to site; therefore, EPA typically identified samples as worker samples unless it was explicitly clear from the job title (e.g., inspectors) and the description of activities in the report that the employee was not operating the degreaser during the sampling period. Samples from employees determined not to be operating the degreasing equipment were designated as ONU samples.



3220 EPA identified inhalation exposure monitoring data from NIOSH investigations at five sites using PCE  
 3221 as a degreasing solvent in OTVDs. Due to the large variety in shop types that may use PCE as a vapor  
 3222 degreasing solvent, there is some uncertainty in how representative these data are of a “typical” shop.  
 3223

3224 **Table 2-27. Summary of Worker Inhalation Exposure Monitoring Data for Open-Top Vapor**  
 3225 **Degreasing**

Exposure Concentration Type	Worker Exposures		Number of Worker Samples	Occupational Non-User Exposures		Number of ONU Samples	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)		Central Tendency (ppm)	High-End (ppm)		
8-hr TWA Exposure Concentration	2.1	32	63	0.6	5.2	12	Medium to High
Acute Exposure Concentration (AC)	0.7	11		0.2	1.7		
Average Daily Concentration (ADC)	0.5	7.3		0.1	1.2		
Lifetime Average Daily Concentration (LADC)	0.2	3.8		5.5E-02	0.6		
15-min TWA Exposure Concentration	17		1	No 4-hr or 15-minute data identified for ONUs			
4-hr TWA Exposure Concentration	1.3	1.6	3				

3226 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.  
 3227 Source: ([NIOSH 2002a](#), [b](#), [d](#); [Gorman et al. 1984](#); [Ruhe 1982](#))  
 3228

3229 **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

3230 Exposure is assessed using PCE personal breathing zone monitoring data from several different sources,  
 3231 with confidence rating of the data ranging from “medium” to “high”, as determined through EPA’s  
 3232 systematic review process. Due to the large variation amongst sites that operate OTVDs, there is some  
 3233 uncertainty in how representative the monitoring data of typical shops. Despite this uncertainty, EPA has  
 3234 a medium to high level of confidence in the assessed exposure for this condition of use, based on the  
 3235 strength of the monitoring data.

### 2.4.1.11 Batch Closed-Loop Vapor Degreasing

#### Worker Activities

For closed-loop vapor degreasing, worker activities can include placing or removing parts from the basket, as well as general equipment maintenance. Workers can be exposed to residual vapor as the door to the degreaser chamber opens after the cleaning cycle is completed. The amount of time workers spend in the degreaser area can vary greatly by site. One NIOSH report ([NIOSH 2002c](#)) reported workers spent 1.5 to 2 hours per shift at the degreaser and another NIOSH report ([NIOSH 2002a](#)) indicating that workers spent over 90% of their day in the degreaser area. Similarly, addition of fresh solvent to the degreasing machine can vary significantly with one site indicating 50 gallons of PCE per month were added and another site indicating 10 to 20 gallons of PCE per year were added to the machine ([NIOSH 2002a, c](#)).

#### Number of Workers and Occupational Non-Users

EPA estimated the number of workers and occupational non-users potentially exposed during use of PCE in closed-loop degreasing using the same methodology as described for OTVDs. This resulted in approximately 97,000 workers and 56,000 ONUs using the number of sites estimated from the 95<sup>th</sup> percentile use-rate and 180,000 workers and 100,000 ONUs using the number of sites estimated from the 50<sup>th</sup> percentile use-rate (see the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate). Table 2-28 summarizes these results. Note: These are bounding estimates and may overestimate actual number of workers.

**Table 2-28. Estimated Number of Workers Potentially Exposed to PCE During Use in Closed-Loop Vapor Degreasing**

Use-Rate Scenario	Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
95th Percentile	13,912	7	4	97,000	56,000	150,000
50th Percentile	25,546	7	4	180,000	100,000	280,000

<sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

#### Occupational Inhalation Exposure Results

EPA identified inhalation exposure monitoring data from NIOSH investigations at two sites using PCE as a degreasing solvent in batch closed-loop vapor degreasers. Due to the large variety in shop types that may use PCE as a vapor degreasing solvent, it is unclear how representative these data are of a “typical” shop. EPA does not have a model for estimating exposures from closed-loop degreasers; therefore, the assessment is based on the identified monitoring data.

Worker samples were determined to be any sample taken on a person while performing the degreasing tasks. ONUs samples were determined to be any sample taken on a person in the same location as the degreaser but not performing the degreasing themselves.

3273 Table 2-29 summarizes the 8-hr TWA and 4-hr TWA monitoring data for the use of PCE in closed-loop  
 3274 vapor degreasers. For workers, the 8-hr TWA high-end and central tendency are based on the 95<sup>th</sup> and  
 3275 50<sup>th</sup> percentiles, respectively. Due to the limited data points for worker 4-hr TWAs, EPA used the  
 3276 maximum and median as the high-end and central tendency, respectively. For ONUs, only two data  
 3277 points were available; therefore, EPA presents two scenarios: 1) using the maximum as a “higher value,”  
 3278 and 2) using the midpoint as a “midpoint value.”  
 3279

3280 When comparing to monitoring data from OTVDs, the data show a decrease in worker exposure of  
 3281 99.2% at the 95<sup>th</sup> percentile and 96.6% at the 50<sup>th</sup> percentile and a decrease in ONU exposure of 98.2%  
 3282 at the 95<sup>th</sup> percentile and 89.2% at the 50<sup>th</sup> percentile. This is generally consistent with data in literature  
 3283 which found that solvent purchases for closed-loop systems were reduced by 83% to over 98% as  
 3284 compared to OTVDs and air emissions were reduced from 95% to over 99% as compared to OTVDs  
 3285 ([Durkee 2014](#); [Newmoa 2001](#)).  
 3286

3287 **Table 2-29. Summary of Worker Inhalation Exposure Monitoring Data for Closed-Loop Vapor**  
 3288 **Degreasing**

Exposure Concentration Type	Worker Exposures		Number of Worker Samples	Occupational Non-User Exposures <sup>a</sup>		Number of ONU Samples	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)		Central Tendency (ppm)	High-End (ppm)		
8-hr TWA Exposure Concentration	7.2E-02	0.3	13	6.5E-02	9.6E-02	2	High
Acute Exposure Concentration (AC)	2.4E-02	8.4E-02		2.2E-02	3.2E-02		
Average Daily Concentration (ADC)	1.6E-02	5.8E-02		1.5E-02	2.2E-02		
Lifetime Average Daily Concentration (LADC)	6.6E-03	3.0E-02		5.9E-03	1.1E-02		
4-hr TWA Exposure Concentration	2.0E-02	8.6E-02	3	No 4-hr data identified for ONUs			

3289 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.  
 3290 <sup>a</sup> Due to only two data points identified, EPA presents two scenarios: 1) using the higher of the two values; and 2) using the  
 3291 midpoint of the two values.  
 3292 Source: ([NIOSH 2002a, c](#))  
 3293

3294 **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

3295 Exposure is assessed using PCE personal breathing zone monitoring data from two sources with the data  
 3296 determined to have a “high” confidence rating, as determined through EPA’s systematic review process.  
 3297 The data show a decrease in exposure concentrations as compared to OTVD monitoring data that agrees  
 3298 with literature expectations. Based on the reasonably available information above, EPA has a high level  
 3299 of confidence in the assessed exposure for this condition of use.

### 2.4.1.12 ConveyORIZED Vapor Degreasing

#### Worker Activities

For conveyORIZED vapor degreasing, worker activities can include placing or removing parts from the basket, as well as general equipment maintenance. Depending on the level of enclosure and specific conveyor design, workers can be exposed to vapor emitted from the inlet and outlet of the conveyor portal.

#### Number of Workers and Occupational Non-Users

EPA estimated the number of workers and occupational non-users potentially exposed during use of PCE in conveyORIZED degreasing using the same methodology as described for OTVDs. This resulted in approximately 2,800 workers and 1,600 ONUs using the number of sites estimated from the 95<sup>th</sup> percentile use-rate and 4,000 workers and 2,300 ONUs using the number of sites estimated from the 50<sup>th</sup> percentile use-rate (see the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate). Table 2-30 summarizes these results. Note: These are bounding estimates and may overestimate actual number of workers.

**Table 2-30. Estimated Number of Workers Potentially Exposed to PCE During Use in ConveyORIZED Vapor Degreasing**

Use-Rate Scenario	Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
95th Percentile	395	7	4	2,800	1,600	4,300
50th Percentile	568	7	4	4,000	2,300	6,200

<sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

#### Occupational Inhalation Exposure Results

EPA did not identify any inhalation exposure monitoring data related to the use of PCE in conveyORIZED degreasing. Therefore, EPA assessed inhalation exposures during conveyORIZED degreasing using the ConveyORIZED Degreasing Near-Field/Far-Field Inhalation Exposure Model. Details of the model design and parameters is provided in Appendix G of the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)).

The key parameter in the model is the emission rate from the degreaser. Emission rates were modeled using the reported unit emissions of PCE from the single conveyORIZED degreaser in the 2014 NEI ([U.S. EPA 2018a](#)). The model estimates exposures for both workers and ONUs. Workers estimates are based on concentrations in the near-field where the conveyORIZED degreasing work occurs, and ONU exposures are based on concentrations in the far-field away from the conveyORIZED degreaser. The results from the inhalation model are provided in Table 2-31. The high-end and central tendency are the 95<sup>th</sup> and 50<sup>th</sup> percentiles, respectively, calculated by the model.

3337 **Table 2-31. Summary of Exposure Modeling Results for Use of PCE in Conveyorized Vapor**  
 3338 **Degreasing**

Exposure Concentration Type	Worker Exposures		Occupational Non-User Exposures		Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)	Central Tendency (ppm)	High-End (ppm)	
8-hr TWA Exposure Concentration	78	186	41	126	N/A – modeled data
Acute Exposure Concentration (AC)	26	62	14	42	
Average Daily Concentration (ADC)	18	42	9.3	29	
Lifetime Average Daily Concentration (LADC)	6.7	17	3.5	12	

3339 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

3340

3341 **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

3342 Exposure is assessed using the Conveyorized Degreasing Near-Field/Far-Field Inhalation Exposure  
 3343 Model. The model uses a Monte Carlo analysis, which incorporates variability in the model input  
 3344 parameters. Only a single emission rate data point was available for PCE conveyorized degreasing for  
 3345 use in the model and there is some uncertainty in how representative this data point is of a “typical”  
 3346 conveyorized degreaser. Based on the reasonably available information above, EPA has a medium level  
 3347 of confidence in the assessed exposure for this condition of use.

3348 **2.4.1.13 Web Degreasing**

3349 **Worker Activities**

3350 Worker activities for web degreasing are expected to be similar to other degreasing uses and can include  
 3351 placing or removing parts from the degreasing machine, as well as general equipment maintenance.  
 3352 Depending on the level of enclosure and specific design, workers can be exposed to vapor emitted from  
 3353 the inlet and outlet of the conveyor portal.

3354

3355 **Number of Workers and Occupational Non-Users**

3356 EPA estimated the number of workers and occupational non-users potentially exposed during use of  
 3357 PCE in web degreasing using the same methodology as described for OTVDs. This resulted in  
 3358 approximately 2,800 workers and 1,600 ONUs using the number of sites estimated from the 95<sup>th</sup>  
 3359 percentile use-rate and 4,000 workers and 2,300 ONUs using the number of sites estimated from the 50<sup>th</sup>  
 3360 percentile use-rate (see the *Assessment of Occupational Exposure and Environmental Releases for*  
 3361 *Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report)  
 3362 ([U.S. EPA 2020d](#)) for number of sites estimate). Table 2-32 summarizes these results. Note: These are  
 3363 bounding estimates and may overestimate actual number of workers.

3364

3365 **Table 2-32. Estimated Number of Workers Potentially Exposed to PCE During Use in Web**  
 3366 **Degreasing**

Use-Rate Scenario	Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
95th Percentile	395	7	4	2,800	1,600	4,300
50th Percentile	568	7	4	4,000	2,300	6,200

<sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

3367  
3368

3369 **Occupational Inhalation Exposure Results**

3370 EPA did not identify any inhalation exposure monitoring data related to the use of PCE in web  
 3371 degreasing. Therefore, EPA assessed inhalation exposures during web degreasing using the Web  
 3372 Degreasing Near-Field/Far-Field Inhalation Exposure Model. Details of the model design and  
 3373 parameters is provided in Appendix G of the *Assessment of Occupational Exposure and Environmental*  
 3374 *Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental  
 3375 Engineering Report) ([U.S. EPA 2020d](#)).

3376

3377 The key parameter in the model is the emission rate from the degreaser. Emission rates were modeled  
 3378 using the reported unit emissions of PCE from web degreasers in the 2014 NEI ([U.S. EPA 2018a](#)). The  
 3379 model estimates exposures for both workers and ONUs. Workers estimates are based on concentrations  
 3380 in the near-field where the web degreasing work occurs, and ONU exposures are based on  
 3381 concentrations in the far-field away from the web degreaser. The results from the inhalation model are  
 3382 provided in Table 2-33. The high-end and central tendency are the 95<sup>th</sup> and 50<sup>th</sup> percentiles, respectively,  
 3383 calculated by the model.

3384

3385 **Table 2-33. Summary of Exposure Modeling Results for Use of PCE in Web Degreasing**

Exposure Concentration Type	Worker Exposures		Occupational Non-User Exposures		Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)	Central Tendency (ppm)	High-End (ppm)	
8-hr TWA Exposure Concentration	0.6	1.8	0.3	1.2	N/A – modeled data
Acute Exposure Concentration (AC)	0.2	0.6	0.1	0.4	
Average Daily Concentration (ADC)	0.1	0.4	7.3E-02	0.3	
Lifetime Average Daily Concentration (LADC)	5.3E-02	0.2	2.7E-02	0.1	

3386

AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

3387

**3388 Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

3389 Exposure is assessed using the Web Degreasing Near-Field/Far-Field Inhalation Exposure Model. The  
3390 model uses a Monte Carlo analysis, which incorporates variability in the model input parameters. Due to  
3391 the limited number of data points, there is some uncertainty on the representativeness of emission rates  
3392 from the 2014 NEI ([U.S. EPA 2018a](#)) of “typical” web degreasers. Based on the reasonably available  
3393 information above, EPA has a medium level of confidence in the assessed exposure for this condition of  
3394 use.

3395

**2.4.1.14 Cold Cleaning****3396 Worker Activities**

3397 The general worker activities for cold cleaning include placing the parts that require cleaning into a  
3398 vessel. The vessel is usually something that will hold the parts but not the liquid solvent (i.e., a wire  
3399 basket). The vessel is then lowered into the machine, where the parts could be sprayed, and then  
3400 completely immersed in the solvent. After a short time, the vessel is removed from the solvent and  
3401 allowed to drip/air dry. Depending on the industry and/or company, these operations may be performed  
3402 manually (i.e., by hand) or mechanically. Sometimes parts require more extensive cleaning; in these  
3403 cases, additional operations are performed including directly spraying solvent on the part, agitation of  
3404 the solvent or parts, wipe cleaning and brushing ([NIOSH 2001a](#); [U.S. EPA 1997](#)).

3405

**3406 Number of Workers and Occupational Non-Users**

3407 EPA estimated the number of workers and occupational non-users potentially exposed during use of  
3408 PCE in cold cleaners using Bureau of Labor Statistics’ OES data ([U.S. BLS 2016](#)) and the U.S. Census’  
3409 SUSB ([U. S. Census Bureau 2015](#)) as well as the NAICS code reported by the site in the 2014 NEI (see  
3410 the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene,*  
3411 *1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for  
3412 number of sites estimate)([U.S. EPA 2018a](#)). In the 2014 NEI ([U.S. EPA 2018a](#)), four sites reported  
3413 NAICS code for which there was no Census data available. To estimate the number of workers/ONUs at  
3414 these sites, EPA referenced the 2017 Emission Scenario Document (ESD) on the Use of Vapor  
3415 Degreasers ([OECD 2017a](#))<sup>12</sup>. There are approximately 710 workers and 420 ONUs potentially exposed  
3416 during use of PCE in cold cleaning (see Table 2-34).

3417

3418 It should be noted that this number is expected to underestimate the total number of workers and ONUs  
3419 exposed to PCE during cold cleaning as NEI data does not include cold cleaner operations that are  
3420 classified as area sources. Area sources are reported at the county level and do not include site-specific  
3421 information. Therefore, any sites operating a cold cleaning machine that is classified as an area source  
3422 would not be included in the count of sites in the 2014 NEI. EPA does not have sufficient information to  
3423 estimate the number of area sources that may operate cold cleaning machines.

3424

---

<sup>12</sup> Although the ESD covers vapor degreasers not cold cleaners, the types of industries using cold cleaners are assumed to be similar to those using vapor degreasers. Therefore, the number of workers/ONUs are assumed to be similar.

3425 **Table 2-34. Estimated Number of Workers Potentially Exposed to PCE During Use in Cold**  
 3426 **Cleaning**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
17	42	25	710	420	1,100

3427 <sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.  
 3428

### 3429 Occupational Inhalation Exposure Results

3430 Table 2-35 summarizes the 8-hr TWA and 4-hr TWA monitoring data for the use of PCE in cold  
 3431 cleaners. For the 8-hr TWA, the 95<sup>th</sup> percentile and 50<sup>th</sup> percentile of the identified exposure data are  
 3432 presented as the high-end and central tendency exposure values, respectively. Due to the limited number  
 3433 of data points for the 4-hr TWA, the maximum and 50<sup>th</sup> percentile (median) of the data are presented as  
 3434 the high-end and central tendency, respectively. The data were obtained from two sources: 1) a NIOSH  
 3435 In-Depth Survey Report ([NIOSH 2002c](#)); and 2) a study submitted to EPA by Vulcan Chemicals ([1994](#))  
 3436 under TSCA.

3437  
 3438 Worker samples were determined to be any sample taken on a person while performing the cold  
 3439 cleaning tasks. ONUs samples were determined to be any sample taken on a person in the same location  
 3440 as the cold cleaning machine but not performing the cold cleaning themselves. The results only include  
 3441 values for workers as monitoring data for ONUs were not identified. EPA estimates that ONU exposures  
 3442 are lower than worker exposures, since ONUs do not typically directly handle the chemical.  
 3443

3444 **Table 2-35. Summary of Worker Inhalation Exposure Monitoring Data for Use of PCE in Cold**  
 3445 **Cleaning**

Exposure Concentration Type	Central Tendency (ppm)	High-End (ppm)	Number of Samples	Data Quality Rating of Air Concentration Data
8-hr TWA Exposure Concentration	1.4	4.1	29	High
Acute Exposure Concentration (AC)	0.5	1.4		
Average Daily Concentration (ADC)	0.3	0.9		
Lifetime Average Daily Concentration (LADC)	0.1	0.5		
4-hr TWA Exposure Concentration	2.9	4.3	5	

3446 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

3447 Source: ([NIOSH 2002c](#); [Vulcan 1994](#))  
 3448

3449 Due to the large variety in shop types that may use PCE as a cold cleaning solvent, it is unclear how  
 3450 representative these data are of a “typical” shop. Therefore, EPA supplemented the identified monitoring  
 3451 data using the Cold Cleaning Near-Field/Far-Field Inhalation Exposure Model. Details of the model  
 3452 design and parameters is provided in Appendix G of the *Assessment of Occupational Exposure and*  
 3453 *Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4*  
 3454 (Supplemental Engineering Report) ([U.S. EPA 2020d](#)). The results from the model are provided in



3455 Table 2-36. For model results, the high-end and central tendency are the 95<sup>th</sup> and 50<sup>th</sup> percentiles,  
 3456 respectively.

3457  
 3458 The key parameter in the model is the emission rate from the cold cleaning machine. Emission rates  
 3459 were modeled using a discrete distribution of reported cold cleaning machine unit emissions of PCE in  
 3460 the 2014 NEI (U.S. EPA 2018a). The model estimates exposures for both workers and ONUs. Workers  
 3461 estimates are based on concentrations in the near-field where the cold cleaning work occurs, and ONU  
 3462 exposures are based on concentrations in the far-field away from the cold cleaning machine.

3463  
 3464 The high-end results of the model are within the same order of magnitude as the high-end and central  
 3465 tendency found in the monitoring data. However, the central tendency estimated by the model is three  
 3466 orders of magnitude lower than the central tendency from the monitoring data. This may be due to the  
 3467 limited number of sites from which the monitoring data were taken whereas the model is meant to  
 3468 capture a broader range of scenarios.

3469  
 3470 **Table 2-36. Summary of Exposure Modeling Results for Use of PCE in Cold Cleaning**

Exposure Concentration Type	Worker Exposures		Occupational Non-User Exposures		Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)	Central Tendency (ppm)	High-End (ppm)	
8-hr TWA Exposure Concentration	2.4E-03	1.5	1.2E-03	0.8	N/A – modeled data
Acute Exposure Concentration (AC)	8.0E-04	0.5	4.1E-04	0.3	
Average Daily Concentration (ADC)	5.5E-04	0.4	2.8E-04	0.2	
Lifetime Average Daily Concentration (LADC)	2.0E-04	0.1	1.1E-04	6.7E-02	

3471 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

3472  
 3473 **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

3474 Exposure is assessed using PCE personal breathing zone monitoring data from two sources with the data  
 3475 determined to have a “high” confidence rating, as determined through EPA’s systematic review process.  
 3476 The exposure data are supplemented with near-field/far-field exposure modeling using a Monte Carlo  
 3477 analysis, which incorporates variability in the model input parameters. The high-end model results  
 3478 generally agree with monitoring data high-end and central tendency. However, the central tendency  
 3479 model results are three orders of magnitude lower than the monitoring data. This may be due to  
 3480 uncertainty in the representativeness of the monitoring data of “typical” exposures from cold cleaning.  
 3481 Based on the reasonably available information above, EPA has a medium to high level of confidence in  
 3482 the assessed exposure for this condition of use.

3483 **2.4.1.15 Aerosol Degreasing and Aerosol Lubricants**

3484 **Worker Activities**

3485 PCE-based aerosol products include degreasers for applications such as brake cleaning, engine  
 3486 degreasing, electric motor cleaners, cable cleaners, coil cleaners, and other metal product cleaning.  
 3487 Additional aerosol products include penetrating lubricants and oils, high pressure non-melt red greases,  
 3488 white lithium greases, silicone lubricants, chain and cable lubricants, vandal mark removers, mold  
 3489 cleaners, and weld anti-spatter protectants. EPA expects significant overlap in the industry sectors that  
 3490 use aerosol-based products; therefore, these uses are assessed together.

3491  
 3492 One example of a commercial setting with aerosol degreasing operations is repair shops, where service  
 3493 items are cleaned to remove any contaminants that would otherwise compromise the service item’s  
 3494 operation. Internal components may be cleaned in place or removed from the service item, cleaned, and  
 3495 then re-installed once dry ([U.S. EPA 2014a](#)).

3496  
 3497 Workers at these facilities are expected to be exposed through dermal contact with and inhalation of  
 3498 mists during application of the aerosol product to the service item. ONUs are expected to have lower  
 3499 inhalation exposures and are not expected to have dermal exposures.

3500  
 3501 **Number of Workers and Occupational Non-Users**

3502 EPA estimated the number of workers and occupational non-users potentially exposed to aerosol  
 3503 degreasers and aerosol lubricants containing PCE using Bureau of Labor Statistics’ OES data ([U.S. BLS  
 3504 2016](#)) and the U.S. Census’ SUSB ([U. S. Census Bureau 2015](#)) (see the *Assessment of Occupational  
 3505 Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN:  
 3506 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate). Based on  
 3507 the market penetration of 29.6% and data from the BLS and U.S. Census, there are approximately  
 3508 250,000 workers and 29,000 occupational non-users potentially exposed to PCE as an aerosol  
 3509 degreasing solvent or aerosol lubricant (see Table 2-37) ([U.S. BLS 2016](#); [U. S. Census Bureau 2015](#);  
 3510 [CARB 2000](#)).

3511  
 3512 **Table 2-37. Estimated Number of Workers Potentially Exposed to PCE During Use of Aerosol  
 3513 Degreasers and Aerosol Lubricants**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site <sup>a</sup>	Total Exposed Workers <sup>b</sup>	Total Exposed Occupational Non-Users <sup>b</sup>	Total Exposed <sup>b</sup>
75,938	3	0.4	250,000	29,000	280,000

3514 <sup>a</sup> Number of workers and occupational non-users per site are calculated by dividing the exposed number of workers or  
 3515 occupational non-users by the number of establishments. The number of workers per site is rounded to the nearest integer.  
 3516 The number of occupational non-users per site is shown as 0.4, as it rounds down to zero.

3517 <sup>b</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

3518  
 3519 **Occupational Inhalation Exposure Results**

3520 EPA identified inhalation exposure monitoring data related to the use of PCE in aerosol degreasers for  
 3521 brake servicing. However, PCE is used in a variety of other aerosol degreasing applications and other  
 3522 aerosol products for which EPA did not identify any inhalation exposure monitoring data. Therefore,  
 3523 EPA supplemented the identified monitoring data using the Brake Servicing Near-Field/Far-Field  
 3524 Inhalation Exposure Model. EPA used the brake servicing model as a representative scenario for this  
 3525 condition of use as there was ample data describing the brake servicing use and it is a significant use of

3526 PCE-based aerosol products. Details of the model design and parameters is provided in Appendix H of  
 3527 the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene,*  
 3528 *1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)).  
 3529

3530 Table 2-38 summarizes 8-hr TWA PBZ monitoring data and 15-min TWA PBZ monitoring data for the  
 3531 use of PCE-based aerosol products. The 95<sup>th</sup> percentile of the identified monitoring data is presented as  
 3532 the high-end exposure and the 50<sup>th</sup> percentile is presented as the central tendency. The data were  
 3533 obtained from three studies on the use of aerosol brake cleaners during commercial brake servicing and  
 3534 from data provided to EPA from the Department of Defense (DoD) ([U.S. DOD and Environmental](#)  
 3535 [Health Readiness System - Industrial 2018](#); [Cosgrove and Hygiene 1994](#); [Vulcan 1993, 1992](#)). It should  
 3536 be noted that one study evaluated various formulations of aerosol degreasers containing 25% PCE, and  
 3537 another study evaluated one formulation containing 30% PCE, and one with 60% PCE. Based on data  
 3538 from CARB ([CARB 2000](#)) and modeling results, PCE concentration in brake cleaning products ranges  
 3539 from 20% to 99% with a median concentration of 78.4%. The monitoring data collected in these two  
 3540 studies may underestimate “typical” exposures as the PCE concentration in the evaluated formulations  
 3541 were all below the median concentration.  
 3542

3543 Worker samples were determined to be any sample taken on a person while performing the aerosol  
 3544 degreasing tasks. ONUs samples were determined to be any sample taken on a person in the same  
 3545 location as the aerosol degreasing but not performing the aerosol degreasing themselves. The results  
 3546 only include values for workers as monitoring data for ONUs were not identified.  
 3547

3548 **Table 2-38. Summary of Worker Inhalation Exposure Monitoring Data for Aerosol Degreasing**

Exposure Concentration Type	Central Tendency (ppm)	High-End (ppm)	Number of Samples	Data Quality Rating of Air Concentration Data
8-hr TWA Exposure Concentration	1.4	7.8	130	High
Acute Exposure Concentration (AC)	0.5	2.6		
Average Daily Concentration (ADC)	0.3	1.8		
Lifetime Average Daily Concentration (LADC)	0.1	0.9		
15-min TWA Exposure Concentration	29	123	67	

3549 AC = Acute Concentration; ADC = Average Daily Concentration and LADC = Lifetime Average Daily Concentration.  
 3550 Source: ([U.S. DOD and Environmental Health Readiness System - Industrial 2018](#); [Cosgrove and Hygiene 1994](#); [Vulcan](#)  
 3551 [1993, 1992](#))  
 3552

3553 Key model inputs include number of aerosol applications per job, the amount of degreaser applied per  
 3554 brake job, and the concentration (weight fraction) of PCE in the aerosol degreaser. The values and  
 3555 distributions for these inputs are largely based on site data from maintenance and auto repair shops  
 3556 obtained by CARB ([2000](#)) for brake cleaning activities. The model estimates exposures for both workers  
 3557 and ONUs. Workers estimates are based on concentrations in the near-field where the aerosol  
 3558 degreasing work occurs, and ONU exposures are based on concentrations in the far-field away from the  
 3559 aerosol degreasing applications.  
 3560

3561 The results from model are provided in Table 2-39. It calculates both 8-hr TWA exposure concentrations  
 3562 and maximum 1-hr TWA exposure concentrations. The high-end and central tendency are the 95<sup>th</sup> and  
 3563 50<sup>th</sup> percentiles, respectively, calculated by the model. The model exposure levels at both the central  
 3564 tendency and high-end for workers are higher than that found in the monitoring data but are within one  
 3565 order of magnitude of the monitoring data. The discrepancy is not unexpected as the model is meant to  
 3566 capture a wider range of shop conditions than is found in the monitoring data and the monitoring data  
 3567 includes data for sites using brake cleaning formulations containing concentrations less than the median  
 3568 concentration (78.4%) used in the model.

3570 **Table 2-39. Summary of Exposure Modeling Results for Use of PCE in Aerosol Degreasing and**  
 3571 **Aerosol Lubricants**

Exposure Concentration Type	Worker Exposures		Occupational Non-User Exposures		Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)	Central Tendency (ppm)	High-End (ppm)	
8-hr TWA Exposure Concentration	5.5	17	0.1	0.7	N/A – modeled data
Acute Exposure Concentration (AC)	1.8	5.7	3.4E-02	0.2	
Average Daily Concentration (ADC)	1.3	3.9	2.0E-02	0.2	
Lifetime Average Daily Concentration (LADC)	0.5	1.6	1.0E-02	7.0E-02	
Maximum 1-hr TWA Exposure Concentration	17	50	0.3	2.2	

3572 AC = Acute Concentration; ADC = Average Daily Concentration and LADC = Lifetime Average Daily Concentration.  
 3573

3574 **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

3575 Exposure is assessed using PCE personal breathing zone monitoring data from several different sources,  
 3576 with confidence ratings of “high”, as determined through EPA’s systematic review process. The  
 3577 exposure data are supplemented with near-field/far-field exposure modeling using a Monte Carlo  
 3578 analysis, which incorporates variability in the model input parameters. Model results are generally  
 3579 higher than monitoring data; however, the monitoring data includes data from three sources that had  
 3580 concentrations of PCE in the aerosol formulation below the median value predicted by the model. Based  
 3581 on the reasonably available information above, EPA has a high level of confidence in the assessed  
 3582 exposure for this condition of use.

3583 **2.4.1.16 Dry Cleaning and Spot Cleaning**

3584 **Worker Activities**

3585 Worker activities at dry cleaning shops can include:

- 3586 • Receiving garments and tagging garments for identification;
- 3587 • Inspecting and sorting garments by color, weight, finish;

- Pre-treating any visible stain on the garment with a spotter, typically from a spray or squeeze bottle;
- Loading garments into the machine, running the wash cycle, and unloading the cleaned garments;
- Post-spotting any stain that was not already removed during the dry cleaning process; and
- Pressing and finishing, after which the pressed garment is returned to an overhead rack and wrapped in plastic for customer pickup ([NIOSH 1997a](#)).

EPA expects worker exposure at dry cleaning facilities to primarily occur when workers are: 1) unloading and loading garments from the machines; 2) performing manual stain removal (i.e., spot cleaning); and 3) transferring solvent from a storage container to the machine. Workers can also be exposed during maintenance activities, such as cleaning the machine lint trap, button trap and still, changing solvent filters, and disposing hazardous wastes. However, these maintenance activities occur on a much less frequent basis ([NIOSH 1997a](#)).

ONUs at dry cleaning facilities are employees who are not expected to handle PCE, operate dry cleaning machines, or perform spotting or finishing operations. They include cashiers, counter clerks and other similar employees.

#### Number of Workers and Occupational Non-Users

EPA estimated the number of workers and occupational non-users potentially exposed to PCE at dry cleaners using Bureau of Labor Statistics’ OES data ([U.S. BLS 2016](#)) and the U.S. Census’ SUSB ([U. S. Census Bureau 2015](#)). Based on a market penetration of 60% for commercial facilities, assuming 12 industrial dry cleaners (see the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate), and data from the BLS and U.S. Census, there are approximately 44,000 workers and 14,000 occupational non-users potentially exposed to PCE at dry cleaning facilities (see Table 2-40) ([DLI/NCA 2017](#); [U.S. BLS 2016](#); [U. S. Census Bureau 2015](#); [U.S. EPA 2006b](#)).

**Table 2-40. Estimated Number of Workers Potentially Exposed to PCE During Dry Cleaning**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
12,834	3	1	44,000	14,000	57,000

<sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

#### Occupational Inhalation Exposure Results

Table 2-41 summarizes the 8-hr TWA PBZ monitoring data for workers and ONUs at dry cleaners obtained from OSHA facility inspections, NIOSH studies and data provided to EPA from DoD ([U.S. DOD and Environmental Health Readiness System - Industrial 2018](#); [OSHA 2017](#); [Burroughs 2000](#); [NIOSH 2000](#); [Burroughs 1999a, b](#); [NIOSH 1995](#)). The data are divided into two categories: 1) statistics for data collected after the promulgation of the 2006 PCE NESHAP for Dry Cleaning Facilities; and 2) data collected for fourth or fifth generation machines only. The post-2006 NESHAP data are expected to contain exposures from shops using third, fourth and fifth generation machines as the purchase of new first generation (transfer machines) and second generation (dry-to-dry, vented machines) dry cleaning

3631 machines were banned in the 1993 Perchloroethylene NESHAP for Dry Cleaning Facilities, the 2006  
3632 Perchloroethylene NESHAP for Dry Cleaning Facilities banned the use of PCE in all first-generation  
3633 machines, and the typical useful life of these machines is approximately 15 years ([U.S. EPA 2006b](#)).  
3634

3635 Third generation equipment are non-vented, dry-to-dry machines with refrigerated condensers. These  
3636 machines are essentially closed systems and are only open to the atmosphere when the machine door is  
3637 opened. In third generation machines, heated drying air is recirculated back to the drying drum through a  
3638 vapor recovery system ([NIOSH 1997b](#)).  
3639

3640 Fourth generation dry cleaning equipment are essentially third-generation machines with added  
3641 secondary vapor control. These machines “rely on both a refrigerated condenser and carbon adsorbent to  
3642 reduce the PCE concentration at the cylinder outlet below 300 ppm at the end of the dry cycle” and are  
3643 more effective at recovering solvent vapors ([NIOSH 1997b](#)). Fifth generation equipment have the same  
3644 features as fourth generation machines, but also have a monitor inside the machine drum and an  
3645 interlocking system to ensure that the concentration is below approximately 300 ppm before the loading  
3646 door can be opened ([NIOSH 1997b](#)).  
3647

3648 For workers, the 95<sup>th</sup> percentile is presented as the high-end and the 50<sup>th</sup> percentile is presented as the  
3649 central tendency. For the post-2006 NESHAP data, only a single data point was available for ONUs. For  
3650 fourth and fifth generation machines, there was only four ONU data points available; therefore, the  
3651 maximum is presented as the high-end and the median as the central tendency.  
3652

3653 Approximately 28% of respondents to a 2003 survey of California dry cleaners indicated they used  
3654 fourth generation machines and approximately 61% of respondents to a 2010 survey of dry cleaners in  
3655 King County, WA reported using fourth or fifth generation machines ([Whittaker and Johanson 2011](#);  
3656 [California Air Resources 2006](#)). EPA did not identify data for other locales or for the overall U.S.;  
3657 therefore, EPA used the California and King County, WA data to approximate the overall U.S. trends.  
3658 Based on these survey results, EPA expects the industry to be trending towards higher usage of fourth  
3659 and fifth generation machines as compared to third generation machines and expects current exposures  
3660 at dry cleaning shops to fall somewhere between the post-2006 exposure concentrations and the  
3661 concentrations from fourth and fifth generation machines only.  
3662

3663 Worker samples were determined to be any sample taken on a person who engages in loading/unloading  
3664 clothes from dry cleaning equipment, finishing operations, spot cleaning, and/or maintenance activities  
3665 for the dry cleaning machine (e.g., replenishing spent solvent). ONUs samples were determined to be  
3666 any sample taken on a person not expected to perform these activities (e.g., cashiers).  
3667

3668

**Table 2-41. Summary of Inhalation Exposure Monitoring Data for Dry Cleaning**

Data Category	Exposure Concentration Type	Worker Exposures		Number of Worker Samples	Occupational Non-User Exposures		Number of ONU Samples	Data Quality Rating of Air Concentration Data
		Central Tendency (ppm)	High-End (ppm)		Central Tendency (ppm)	High-End (ppm)		
Post-2006 NESHAP Data <sup>a</sup>	8-hr TWA Exposure Concentration	3.6	20	21	0.3 <sup>c</sup>		1 <sup>d</sup>	High
	Acute Exposure Concentration (AC)	1.2	6.5		0.1	0.1		
	Average Daily Concentration (ADC)	0.9	5.2		8.2E-02	9.3E-02		
	Lifetime Average Daily Concentration (LADC)	0.3	2.7		3.3E-02	4.8E-02		
	15-min TWA Exposure Concentration	33	94	9	No 15-min data identified for ONUs			
Fourth and Fifth Generation Statistics <sup>b</sup>	8-hr TWA Exposure Concentration	1.0	5.6	114	1.4E-02	0.1	4	High
	Acute Exposure Concentration (AC)	0.3	1.9		4.7E-03	4.1E-02		
	Average Daily Concentration (ADC)	0.2	1.5		3.3E-03	3.3E-02		
	Lifetime Average Daily Concentration (LADC)	9.2E-02	0.8		1.3E-03	1.7E-02		
	15-min TWA Exposure Concentration	48	899	6	No 15-min data identified for ONUs			

3669

AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

3670 <sup>a</sup> Post-2006 NESHAP data are air samples collected from OSHA inspections or DoD and, based on the date of collection,  
3671 EPA assumed to be representative of the post-2006 mix of machine types as provided in the 2010 King County, WA survey  
3672 ([Whittaker and Johanson 2011](#)).

3673 <sup>b</sup> Fourth and fifth generation data include only data where EPA could clearly identify the machine type in the study as fourth  
3674 or fifth generation. It does not include OSHA data, which are representative of a mix of machine generations but for which  
3675 machine types for individual samples could not be determined.

3676 <sup>c</sup> Only one data point was available for this scenario. However, different parameters are used for calculating high-end and  
3677 central tendency ADC and LADC. Therefore, a high-end and central tendency are presented based on the single data point.

3678 <sup>d</sup> The single ONU data point comes from a sample taken on an inspector at a dry cleaning site. EPA assumes exposures to the  
3679 inspector would be similar to that of an ONU as inspectors are not expected to handle the chemical or operator dry cleaning  
3680 machines.

3681 Source: ([U.S. DOD and Environmental Health Readiness System - Industrial 2018](#); [OSHA 2017](#); [Burroughs 2000](#); [NIOSH](#)  
3682 [2000](#); [Burroughs 1999a, b](#); [NIOSH 1995](#))

3683  
3684 As estimated in Section 2.2.1.2.2, PCE is expected to be used in thousands of dry cleaning shops  
3685 throughout the U.S. and the monitoring data only captures a small fraction of those shops. Therefore,  
3686 EPA supplemented the identified monitoring data using the Dry cleaning Multi-Zone Inhalation  
3687 Exposure Model to capture variation amongst dry cleaning shops that may not be captured in the  
3688 monitoring data. Details of the model design and parameters are provided in Appendix I of *Assessment*  
3689 *of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-*  
3690 *Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)).

3691  
3692 Key model input parameters include solvent in concentration in the dry cleaning machine after the clean  
3693 cycle has complete, residual solvent in clothing removed from the dry cleaning machine, and spot  
3694 cleaning use rates. The value and distribution used for each of these parameters in the model are based  
3695 on data observed in literature. The model estimates exposures for workers, spot cleaners, and ONUs.  
3696 Workers estimates are based on concentrations in the near-field zone corresponding to unloading clothes  
3697 from the dry cleaning equipment and the near-field zone corresponding to where finishing and pressing  
3698 activities occur. Spot cleaner estimates are based on concentrations in the near-field zone corresponding  
3699 to where the spot cleaning activity occurs. ONU exposures are based on concentrations in the far-field  
3700 which corresponds to any area outside the near-field zones. The results from the model are provided in  
3701 Table 2-42. The high-end and central tendency are the 95<sup>th</sup> and 50<sup>th</sup> percentiles, respectively, calculated  
3702 by the model. It should be noted that the model calculates 12-hr TWAs based on suggestions from the  
3703 peer review of the 2016 Draft Risk Assessment for the TSCA Work Plan Chemical 1-Bromopropane  
3704 that dry cleaning workers may work up to 12 hours per day ([U.S. EPA 2016e](#)).

3705  
3706 It should be noted that EPA did not identify information to estimate the use rate of PCE in spot cleaners;  
3707 however, IRTA ([2007](#)) and ERG ([2005](#)) indicate that the use of PCE in spot cleaners is minimal.  
3708 Specifically, IRTA ([2007](#)) state that only 150 gal of PCE -based spotting agents are used annually in  
3709 California (compared to 42,000 gal of PCE -based spotting agents). ERG ([2005](#)) stated that many PCE  
3710 spotting agents are categorized as oily type paint removers (OTPR), but that the majority of OTPR  
3711 spotting agents contain no PCE. Therefore, EPA set the use rate of PCE spotting agents to zero causing  
3712 the spotting zone of the model to become part of the far-field with exposure concentrations equivalent to  
3713 ONUs.

3714  
3715 When comparing the model results to the post-2006 NESHAP monitoring data results for workers, the  
3716 model high-end is higher than the monitoring data. This is likely because the model is meant to capture a  
3717 wider range of conditions than is likely captured in the monitoring data. The model central tendency for  
3718 workers is slightly less than half the central tendency for the post-2006 NESHAP monitoring data. This  
3719 may be due to the fact the majority of the post-2006 NESHAP data are from OSHA compliance



inspections that are often performed as a result of worker complaints and, therefore, may not necessarily be representative of PCE concentrations encountered in the typical commercial dry cleaning establishment. Additionally, the assumption that post-2006 NESHAP data is representative of the 2010 King County, WA survey results may be inaccurate, and the data could actually represent sites with a higher frequency of third generation machines, resulting in higher exposures. However, model results and monitoring data for the post-2006 NESHAP are within the same order of magnitude.

When comparing the model results to the fourth/fifth generation monitoring data results for workers, the model high-end and central tendency are both an order of magnitude greater than the monitoring data. This is expected as the model captures exposures from facilities with third and fourth/fifth generation machines.

**Table 2-42. Summary of Worker and Occupational Non-Uses Inhalation Exposure Modeling Results for Dry Cleaning**

Exposure Concentration Type	Worker Exposures		Occupational Non-User Exposures		Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)	Central Tendency (ppm)	High-End (ppm)	
8-hr TWA Exposure Concentration	1.4	30	0.1	1.5	N/A – modeled data
Acute Exposure Concentration (AC)	0.7	15	5.4E-02	0.8	
Average Daily Concentration (ADC)	0.5	10	3.8E-02	0.6	
Lifetime Average Daily Concentration (LADC)	0.2	4.1	1.4E-02	0.2	

AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

**Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

Exposure is assessed using PCE personal breathing zone monitoring data from several different sources, with confidence ratings of “high”, as determined through EPA’s systematic review process. The exposure data are supplemented with multi-zone exposure modeling using a Monte Carlo analysis, which incorporates variability in the model input parameters. This model was peer reviewed as part of the 2016 1-BP draft Risk Assessment ([U.S. EPA 2016f](#)) has been updated to address peer review comments, incorporate additional available data, and use PCE-relevant data. Although the model results differ from the monitoring data, they are the same order of magnitude as the post-2006 NESHAP data. The model results are higher than the fourth and fifth generation machine monitoring data which is expected as the model incorporates third generation machines. Based on the reasonably available information above, EPA has a high level of confidence in the assessed exposure for this condition of use.

### 2.4.1.17 Adhesives, Sealants, Paints, and Coatings

#### Worker Activities

Worker activities may include unloading adhesive or coating products from containers into application equipment, and, where used, manual application of the adhesive or coatings (e.g., use of spray guns or brushes to apply product to substrate) (OECD 2015). Workers may be exposed to PCE during the application process if mists are generated such as during spray and roll applications (OECD 2015). Workers may also be exposed to PCE vapors that evaporate from the adhesive or coating as it is applied or during the drying/curing process (OECD 2015). EPA expects ONUs may be exposed to mists or vapors that enter their breathing zone during routine work in areas where coating applications are occurring.

#### Number of Workers and Occupational Non-Users

EPA estimated the number of workers and occupational non-users potentially exposed during use of PCE-containing adhesives and coatings using Bureau of Labor Statistics' OES data (U.S. BLS 2016) and the U.S. Census' SUSB (U. S. Census Bureau 2015) as well as the NAICS code reported by sites in the 2014 NEI (see the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) (U.S. EPA 2020d) for number of sites estimate) (U.S. EPA 2018a). In the 2014 NEI, there were two sites with coating operations that reported a NAICS code for which no Census data were available. To estimate the number of workers and ONUs at these sites, EPA used the average workers per site and ONUs per site from the sites with known data. There are approximately 410 workers and 160 ONUs potentially exposed during use of adhesives/sealants and 1,900 workers and 1,100 ONUs potentially exposed during use of paints/coatings (see Table 2-43).

**Table 2-43. Estimated Number of Workers Potentially Exposed to PCE During of Use Adhesives, Sealants, Paints, and Coatings**

Scenario	Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
Adhesives/Sealants	14	30	11	410	160	570
Paints/Coatings	46	41	24	1,900	1,100	3,000

<sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

#### Occupational Inhalation Exposure Results

EPA identified inhalation exposure monitoring data from a study at a single site in Poland using a PCE-based adhesive, from three NIOSH investigations at three sites using PCE-based coatings, a study submitted to EPA under TSCA for a truck plant using PCE-based coatings, and data provided to EPA from DoD for spray coating processes (U.S. DOD and Environmental Health Readiness System - Industrial 2018; Gromiec et al. 2002; Hanley 1993; Stephenson and Albrecht 1986; Chrostek and Levine 1981; Ford Motor 1981). Due to the large variety in shop types that may use PCE-based adhesives and coatings, it is unclear how representative these data are of a "typical" site using these products. However, EPA does not have a model for estimating exposures from use of adhesives or paints/coatings; therefore, the assessment is based on the identified monitoring data. Table 2-44 summarizes the identified monitoring data.

3788 Worker samples were determined to be any sample taken on a person while performing adhesive or  
 3789 coating applications. ONUs samples were determined to be any sample taken on a person in the same  
 3790 location as the applications but not performing the adhesive/coating application themselves. The results  
 3791 only include values for workers as monitoring data for ONUs were not identified. EPA estimates that  
 3792 ONU exposures are lower than worker exposures, since ONUs do not typically directly handle the  
 3793 chemical. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a  
 3794 surrogate to estimate exposures for ONUs.  
 3795

3796 For adhesives, the study did not provide discrete sample results; therefore, the high-end exposure value  
 3797 is based on the max concentration and the central tendency is based on the mean reported in the study  
 3798 ([Gromiec et al. 2002](#)). For paints/coatings 8-hr TWA, the 95<sup>th</sup> percentile of the data is presented as the  
 3799 high-end and the 50<sup>th</sup> percentile as the central tendency. Due to the limited number of data points for the  
 3800 15-minute TWA, the maximum is presented as the high-end and the median is the central tendency.  
 3801

3802 **Table 2-44. Summary of Inhalation Exposure Monitoring Data for Use of PCE-Based Adhesives,**  
 3803 **Sealants, Paints, and Coatings**

Scenario	Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
		Central Tendency (ppm)	High-End (ppm)			
Adhesives/ Sealants	8-hr TWA Exposure Concentration <sup>b</sup>	8.8E-02	0.8	13	8.8E-02	Medium
	Acute Exposure Concentration (AC)	2.9E-02	0.3		2.9E-02	
	Average Daily Concentration (ADC)	2.0E-02	0.2		2.0E-02	
	Lifetime Average Daily Concentration (LADC)	8.0E-03	9.5E-02		8.0E-03	
Paints/ Coatings	8-hr TWA Exposure Concentration	0.2	4.6	15	0.2	Medium to High
	Acute Exposure Concentration (AC)	7.8E-02	1.5		7.8E-02	
	Average Daily Concentration (ADC)	5.3E-02	1.0		5.3E-02	
	Lifetime Average Daily Concentration (LADC)	2.1E-02	0.5		2.1E-02	
	15-min TWA Exposure Concentration	4.1	7.9	5	4.1	

3804 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

<sup>b</sup> Exact sample times not given in study; however, study indicates that samples were taken for a minimum of 75% of the shift (360 min). Therefore, EPA assumes that the results are representative of an 8-hr TWA exposure.

Source: ([U.S. DOD and Environmental Health Readiness System - Industrial 2018](#); [Gromiec et al. 2002](#); [Hanley 1993](#); [Stephenson and Albrecht 1986](#); [Chrostek and Levine 1981](#); [Ford Motor 1981](#))

### **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

Exposure to workers is assessed using PCE personal breathing zone monitoring data from several different sources, with confidence rating of the data ranging from medium to high, as determined through EPA's systematic review process. Due to potential variations in the types of sites that may use PCE-based adhesives, sealants, paints, and coatings, there is some uncertainty in how representative the monitoring data are of other sites using these types of products. Despite this uncertainty, EPA has a medium level of confidence in the assessed worker exposure for this condition of use.

Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is expected to be lower than that of workers as EPA expects ONUs to be farther from the source of exposure than workers. Therefore, EPA's confidence in the exposure estimate for ONUs is low.

#### **2.4.1.18 Maskant for Chemical Milling**

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##### **Worker Activities**

Information from stakeholder meetings and public comments indicate that in typical maskant application processes the potential for exposure is low as the process is automated and performed in a dedicated room ([Ducommun 2017](#); [Spirit AeroSystems 2017](#); [Tech Met 2017](#)). However, at least one stakeholder indicated that employees may be exposed during maintenance operations ([Spirit AeroSystems 2017](#)). Specific maintenance activities were not described but may include adding fresh maskant and handling of re-captured maskants.

##### **Number of Workers and Occupational Non-Users**

EPA estimated the number of workers and occupational non-users potentially exposed during use of PCE as a chemical maskant using Bureau of Labor Statistics' OES data ([U.S. BLS 2016](#)) and the U.S. Census' SUSB ([U. S. Census Bureau 2015](#)) as well as the primary NAICS and SIC code reported by sites in the 2016 TRI, 2016 DMR, and/or the 2014 NEI (see the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate).

The data from the 2016 TRI, 2016 DMR, and 2014 NEI only covers 28 unique sites; however, market data from ACP indicates there are up to 71 sites using PCE-based maskants ([Products 2017](#)). To estimate the number of workers and ONUs at the remaining sites EPA calculated the average number of workers and ONUs per site from the 28 known sites. This resulted in 95 workers per site and 75 ONUs per site at the unknown sites and a total of approximately 6,700 workers and 5,300 ONUs potentially exposed during maskant uses of PCE (see Table 2-45).

3849 **Table 2-45. Estimated Number of Workers Potentially Exposed to PCE During Use of Chemical**  
 3850 **Maskants**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
71	94	75	6,700	5,300	12,000

3851 <sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.  
 3852

### 3853 Occupational Inhalation Exposure Results

3854 EPA identified inhalation exposure monitoring data from a single NIOSH investigation at an aircraft  
 3855 parts manufacturing site using a dip coating application process for the maskants ([Hervin et al. 1977](#)).  
 3856 The NIOSH report does not specify if PCE is the primary solvent in the maskant, the concentration of  
 3857 PCE in the maskant, or the typical maskant use rates at the site. The identified monitoring data also  
 3858 included 15-min TWA samples collected by the DoD between July 2013 and May 2017 during masking  
 3859 activities ([U.S. DOD and Environmental Health Readiness System - Industrial 2018](#)). The DoD data  
 3860 contained nine samples that were measured below the LOD ([U.S. DOD and Environmental Health](#)  
 3861 [Readiness System - Industrial 2018](#)). To estimate exposure concentrations for data below the LOD, EPA  
 3862 followed the *Guidelines for Statistical Analysis of Occupational Exposure Data* ([U.S. EPA 1994b](#)) as  
 3863 discussed in Section 1.4.5.2. The geometric standard deviation for the data was above 3.0; therefore,  
 3864 EPA used the  $\frac{LOD}{2}$  to estimate the exposure value as specified in the guidelines ([U.S. EPA 1994b](#)).  
 3865

3866 Due to uncertainty in worker activities for chemical milling operations, EPA typically identified samples  
 3867 as worker samples unless it was explicitly clear from the job title and the description of activities in the  
 3868 report that the employee was not working with the maskant chemicals during the sampling period.  
 3869 Samples from employees determined not to be working with the maskant chemicals were designated as  
 3870 ONU samples. The results only include values for workers as monitoring data for ONUs were not  
 3871 identified. EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not  
 3872 typically directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency  
 3873 exposure results as a surrogate to estimate exposures for ONUs.

3874 Due to the variety in both industry types and typical per site maskant use rates and the uncertainty of the  
 3875 PCE concentration in the maskant, it is unclear if these data are representative of a “typical” site.  
 3876 Additionally, the 8-hr and 4-hr data were collected prior to the promulgation of the Aerospace  
 3877 Manufacturing and Rework Facilities NESHAP which regulates the emissions of hazardous air  
 3878 pollutants (HAPs) from various operation at aerospace facilities including chemical milling. To the  
 3879 extent that this NESHAP reduces emissions of PCE into the workroom worker exposures may be lower  
 3880 than identified data. EPA does not have a model for estimating exposures from maskant uses; therefore,  
 3881 the assessment is based on the identified monitoring data. Table 2-46 summarizes the 8-hr, 4-hr, and 15-  
 3882 min TWA monitoring data for the use of PCE in maskants. The 95<sup>th</sup> percentile of the data is presented as  
 3883 the high-end and the 50<sup>th</sup> percentile as the central tendency.  
 3884

3885 **Table 2-46. Summary of Inhalation Exposure Monitoring Data for Chemical Maskants**

Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-Uses Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)			
8-hr TWA Exposure Concentration	1.2	2.1	24	1.2	High
Acute Exposure Concentration (AC)	0.4	0.7		0.4	
Average Daily Concentration (ADC)	0.3	0.5		0.3	
Lifetime Average Daily Concentration (LADC)	0.1	0.2		0.1	
15-min TWA Exposure Concentration	0.6	28	20	0.6	
4-hr TWA Exposure Concentration	2.4	3.2	9	2.4	

3886 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

3887 <sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses  
3888 worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of  
3889 this value for ONUs is unknown.

3890 Source: ([U.S. DOD and Environmental Health Readiness System - Industrial 2018](#); [Hervin et al. 1977](#))

3891

### 3892 **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

3893 Exposure to workers is assessed using PCE personal breathing zone monitoring data from two sources  
3894 with a confidence rating of “high”, as determined through EPA’s systematic review process. However,  
3895 the 8-hr TWA data were collected prior to the Aerospace Manufacturing and Rework Facilities  
3896 NESHAP. There is some uncertainty in how implementing the requirements of the NESHAP may have  
3897 reduced worker exposures (if at all). Despite this uncertainty, EPA has a medium to high level of  
3898 confidence in the assessed worker exposure for this condition of use, based on the strength of the  
3899 monitoring data.

3900

3901 Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical  
3902 representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is  
3903 expected to be lower than that of workers as EPA expects ONUs to be farther from the source of  
3904 exposure than workers. Therefore, EPA’s confidence in the exposure estimate for ONUs is low.

3905

#### 3905 **2.4.1.19 Industrial Processing Aid**

3906

##### 3906 **Worker Activities**

3907 At industrial facilities, workers are potentially exposed when unloading PCE from transport containers  
3908 into intermediate storage tanks and process vessels. Workers may be exposed via inhalation of vapor or  
3909 via dermal contact with liquids while connecting and disconnecting hoses and transfer lines. Once PCE  
3910 is unloaded into process vessels, it may be consumed in the process (e.g. when used for catalyst  
3911 regeneration) or be used until spent and sent for disposal.

3912

3913 ONUs are employees who work at the facilities that process and use PCE, but who do not directly  
3914 handle the material. ONUs may also be exposed to PCE but are expected to have lower inhalation

3915 exposures and are not expected to have dermal exposures. ONUs for this condition of use may include  
3916 supervisors, managers, engineers, and other personnel in nearby production areas.

### 3917 **Number of Workers and Occupational Non-Users**

3918 EPA estimated the number of workers and occupational non-users potentially exposed during use of  
3919 PCE as a processing aid using Bureau of Labor Statistics' OES data ([U.S. BLS 2016](#)) and the U.S.  
3920 Census' SUSB ([U. S. Census Bureau 2015](#)) as well as the primary NAICS and SIC code reported by  
3921 each site in the 2016 TRI or 2016 DMR, respectively (see the *Assessment of Occupational Exposure and*  
3922 *Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4*  
3923 (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate). This results in  
3924 approximately 14,000 workers and 6,000 ONUs potentially exposed during use of PCE as a processing  
3925 aid (see Table 2-47).  
3926

3927  
3928 **Table 2-47. Estimated Number of Workers Potentially Exposed to PCE During Use of Processing**  
3929 **Aids**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
98	140	61	14,000	6,000	20,000

3930 <sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

### 3931 **Occupational Inhalation Exposure Results**

3932 EPA identified inhalation exposure monitoring data from four studies submitted to EPA under TSCA by  
3933 Dow Chemical([Dow Chem 1983a, b, 1982, 1979](#)). The exact function of PCE in each study is not  
3934 explicitly stated; however, the data was collected in the agricultural chemical production and  
3935 distribution, trichloroethylene production, and chloropyridines process areas. Based on CDR reporting,  
3936 PCE is used as a processing aid in agricultural chemical manufacturing; therefore, monitoring data  
3937 collected in the agricultural chemical production area is assessed as a processing aid use of PCE.  
3938 Similarly, chloropyridines are used as intermediates in both the pharmaceutical and agrochemical  
3939 industries ([Scriven and Murugan 2005](#)). Both pharmaceutical and agrochemical industries are expected  
3940 to use PCE as a processing aid; therefore, monitoring data collected in the chloropyridine unit are also  
3941 assessed as a processing aid use. PCE can also be used as an inert material in trichloroethylene  
3942 production ([Snedecor et al. 2004](#)). Use as an inert material would fall under processing aid uses;  
3943 therefore, monitoring data collected during trichloroethylene production is assessed as a processing aid  
3944 use.  
3945

3946  
3947 Worker samples were determined to be any sample taken on a person while directly handling PCE.  
3948 ONUs samples were determined to be any sample taken on a person in the same location as the PCE use  
3949 but not handling PCE. The results only include values for workers as monitoring data for ONUs were  
3950 not identified. EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not  
3951 typically directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency  
3952 exposure results as a surrogate to estimate exposures for ONUs.  
3953

3954 Table 2-48 presents a summary of the identified 8-hr TWA and 30-minute TWA monitoring data. For  
3955 the 8-hr TWA, the 95<sup>th</sup> percentile is presented as the high-end and the 50<sup>th</sup> percentile presented as the  
3956 central tendency. It should be noted that approximately 55% of the 8-hr TWA data were below the LOD.

To estimate exposure concentrations for these data, EPA followed *the Guidelines for Statistical Analysis of Occupational Exposure Data* (U.S. EPA 1994b). The geometric standard deviation for the data was above 3.0; therefore, EPA used the  $\frac{LOD}{2}$  to estimate the exposure value as specified in the guidelines (U.S. EPA 1994b). Because over 50% of the data are below the LOD, calculating statistics from this data does present the potential to introduce biases into the results. Estimation of exposure values for results below the LOD may over- or under-estimate actual exposure thus skewing the calculated statistics higher or lower, respectively. The overall directional bias of the exposure assessment, accounting for both the overestimate and underestimate, is not known.

For the 30-minute TWA, only two data point were available, one of which measured below the LOD. Because only a single data point with a measured value was available, EPA could not calculate a geometric standard deviation. Therefore, EPA presents two scenarios: 1) using the maximum as a “higher value”; and 2) using the midpoint between the maximum and the LOD as a “midpoint” value.

**Table 2-48. Summary of Worker Inhalation Exposure Monitoring Data for Use of PCE as a Processing Aid**

Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)			
8-hr TWA Exposure Concentration	6.0E-02	1.2	89	6.0E-02	Medium
Acute Exposure Concentration (AC)	2.0E-02	0.4		2.0E-02	
Average Daily Concentration (ADC)	1.4E-02	0.3		1.4E-02	
Lifetime Average Daily Concentration (LADC)	5.4E-03	0.1		5.4E-03	
30-min TWA Exposure Concentration <sup>b</sup>	1.7	2.2	2	1.7	

AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

<sup>b</sup> Due to only two data points, one of which measured below the LOD, EPA presents two scenarios: 1) using the higher of the two values; and 2) using the midpoint of the LOD and the maximum.

Source: (Dow Chem 1983a, b, 1982, 1979)

### Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment

Exposure to workers is assessed using PCE personal breathing zone monitoring data from several different sources all with a confidence rating of “medium,” as determined through EPA’s systematic review process. There is some uncertainty in how PCE is used within each process, but literature corroborates categorizing the use as a processing aid. Based on the available information above, EPA has a medium level of confidence in the assessed worker exposure for this condition of use.

Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is



3990 expected to be lower than that of workers as EPA expects ONUs to be farther from the source of  
3991 exposure than workers. Therefore, EPA's confidence in the exposure estimate for ONUs is low.

#### 3992 **2.4.1.20 Metalworking Fluids**

##### 3993 **Worker Activities**

3994 Workers are expected to unload the metalworking fluid from containers; clean containers; dilute water-  
3995 based metalworking fluids; transfer fluids to the trough; performing metal shaping operations; rinse,  
3996 wipe, and/or transfer the completed part; change filters; transfer spent fluids; and clean equipment  
3997 ([OECD 2011](#)).

3998  
3999 ONUs include employees that work at the site where PCE is used in an industrial setting as a  
4000 metalworking fluid, but they typically do not directly handle the chemical and are therefore expected to  
4001 have lower exposures. ONUs for metalworking fluids include supervisors, managers, and tradesmen that  
4002 may be in the processing area but do not perform tasks that result in the same level of exposures as  
4003 machinists.

4004  
4005 Since PCE has a high vapor pressure (18.5 mmHg at 25°C), workers may be exposed to PCE when  
4006 handling liquid metalworking fluid, such as unloading, transferring, and disposing spent metalworking  
4007 fluids and cleaning machines and troughs. The greatest source of potential exposure is during metal  
4008 shaping operations. The high machine speeds can generate airborne mists of the metalworking fluids to  
4009 which workers can be exposed. Additionally, the high vapor pressure of PCE may lead to its evaporation  
4010 from the airborne mist droplets, potentially creating a fog of vapor and mist.

##### 4011 **Number of Workers and Occupational Non-Users**

4012 The ESD on the Use of Metalworking Fluids cites a NIOSH study of 79 small machine shops, which  
4013 observed an average of 46 machinists per site ([OECD 2011](#)). The ESD also cites an EPA effluent limit  
4014 guideline development for the MP&M industry, which estimated a single shift supervisor per shift, who  
4015 may perform tasks such as transferring and diluting neat metalworking fluids, disposing spent  
4016 metalworking fluids, and cleaning the machines and troughs ([OECD 2011](#)). Since the machinists  
4017 perform the metal shaping operations, during which metalworking fluid mists are generated, EPA  
4018 assesses the machinists as workers, as they have the highest potential exposure. EPA assessed the single  
4019 shift supervisor per site as an ONU, as this employee is not expected to have as high an exposure as the  
4020 machinists. Assuming two shifts per day (hence two shift supervisors per day), EPA assesses 46 workers  
4021 and two ONUs per site ([OECD 2011](#)). The number of establishments that use PCE-based metalworking  
4022 fluids is unknown (see discussion in the *Assessment of Occupational Exposure and Environmental*  
4023 *Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental  
4024 Engineering Report) ([U.S. EPA 2020d](#))); therefore, EPA does not have data to estimate the total workers  
4025 and ONUs exposed to PCE from use of metalworking fluids.

##### 4026 **Occupational Inhalation Exposure Results**

4027  
4028 EPA did not identify any inhalation exposure monitoring data related to the use of PCE-based  
4029 metalworking fluids. Therefore, EPA assessed inhalation exposures using the ESD on the Use of  
4030 Metalworking Fluids ([OECD 2011](#)). The ESD estimates typical and high-end exposures for different  
4031 types of metalworking fluids. The "typical" mist concentration is the geometric mean of the data and the  
4032 "high-end" is the 90<sup>th</sup> percentile of the data ([OECD 2011](#)). The recommended use of the PCE-based  
4033 metalworking fluid is an oil-based cutting and tapping fluid; therefore, EPA assesses exposure to the  
4034 PCE-based metalworking fluids using the straight oil mist concentrations and the max concentration of  
4035

PCE in the metalworking fluid. Straight oils are not diluted; therefore, the concentration of PCE specified in the identified SDS (<10%) is equal to the concentration of PCE in the mist.

Table 2-49 presents the exposure estimates for the use of PCE-based metalworking fluids. It should be noted that these estimates may underestimate exposures to PCE during use of metalworking fluids as they do not account for exposure to PCE that evaporates from the mist droplets into the air. This exposure is difficult to estimate and is not considered in this assessment. However, due to the relatively low concentration of PCE in the metalworking fluid, the partial pressure may be low enough such that evaporation of PCE from the mist is limited and this not a significant route of exposure.

The results only include values for workers as the ESD does not include an approach for estimating ONU exposures. EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not typically directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs.

**Table 2-49. Summary of Exposure Results for Use of PCE in Metalworking Fluids Based on ESD Estimates**

Exposure Concentration Type	Worker Exposure		Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)		
8-hr TWA Exposure Concentration <sup>b</sup>	5.8E-03	2.1E-02	5.8E-03	N/A – ESD data
Acute Exposure Concentration (AC)	1.9E-03	7.0E-03	1.9E-03	
Average Daily Concentration (ADC)	1.3E-03	4.8E-03	1.3E-03	
Lifetime Average Daily Concentration (LADC)	5.2E-04	2.5E-03	5.2E-04	

AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

<sup>b</sup> The PCE exposure concentrations are calculated by multiplying the straight oil mist concentrations in the ESD by 10% (the concentration of PCE in the metalworking fluid) and converting to ppm.

**Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

Exposure to workers is assessed using estimates from the Metalworking Fluid ESD for typical and high-end mist exposures for straight oils. The ESD estimates are for a “generic” straight oil rather than a PCE-specific metalworking fluid; therefore, there is some uncertainty in how this data applies to PCE-based metalworking fluids. Additionally, the ESD estimates also only account for the exposure to mist; however, PCE is volatile and expected to evaporate from the mist into the air. Therefore, the ESD estimates may underestimate actual PCE exposure. Due to the low concentration of PCE in the metalworking fluid, the partial pressure of PCE in the mist may be low enough such that this is not a significant route of exposure, thus mitigating the overall underestimate. Based on the available information above, EPA has a medium level of confidence in the assessed worker exposure for this condition of use.

4072 Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical  
4073 representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is  
4074 expected to be lower than that of workers as EPA expects ONUs to be farther from the source of  
4075 exposure than workers. Therefore, EPA's confidence in the exposure estimate for ONUs is low.

#### 4076 **2.4.1.21 Wipe Cleaning and Metal/Stone Polishes**

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##### 4077 **Worker Activities**

4078 Workers are expected to be exposed to PCE vapors that evaporate from the PCE-soaked rag or the  
4079 solvent residue left behind on the substrate after wiping. Additional activities and use patterns will vary  
4080 depending on the specific site at which the PCE cleaning product or polish is being used.

##### 4082 **Number of Workers and Occupational Non-Users**

4083 EPA did not identify information to estimate the number of workers or ONUs exposed to PCE during  
4084 use for wipe cleaning and metal/stone polishes. It is possible some workers/ONUs at sites using vapor  
4085 degreasers or cold cleaners are also exposed to PCE from wipe cleaning activities.

##### 4087 **Occupational Inhalation Exposure Results**

4088 EPA identified inhalation exposure monitoring data from NIOSH investigations at two sites using PCE  
4089 for wipe cleaning ([Moody et al. 1983](#); [Gunter and Lybarger 1979](#)). EPA did not identify exposure data  
4090 specific to metal/stone polish applications; therefore, these data were also used to assess the use of  
4091 metal/stone polishes based on expected similarities in the uses. Due to the large variety in the types of  
4092 shops that may use PCE as a wipe cleaning solvent or metal/stone polish, it is unclear how  
4093 representative these data are of a "typical" site. EPA does not have a model for estimating exposures  
4094 from wipe cleaning or metal/stone polishes; therefore, the assessment is based on the identified  
4095 monitoring data. Table 2-50 summarizes 8-hr, 4-hr and 15-minute TWA monitoring data for the use of  
4096 PCE as a wipe cleaning solvent and metal/stone polish.

4097  
4098 Worker samples were determined to be any sample taken on a person while performing the wipe  
4099 cleaning or polishing task. ONU's samples were determined to be any sample taken on a person in the  
4100 same location as the wipe cleaning or polishing task but were not performing the wipe cleaning or  
4101 polishing themselves.

4102  
4103 Due to the limited number of data points for workers 8-hr and 15-minute TWA results, the maximum of  
4104 identified data is presented as the high-end and the median is presented as the central tendency. There is  
4105 only a single 4-hr TWA data point for workers. Results based on a single value are plausible exposure  
4106 concentrations, but EPA cannot determine the statistical representativeness of the value. For the ONU 8-  
4107 hr TWA, the 95<sup>th</sup> percentile is presented as the high-end and the 50<sup>th</sup> percentile as the central tendency.  
4108 The ONU data included four data points that are below the LOD. To estimate exposure concentrations  
4109 for these data, EPA followed the *Guidelines for Statistical Analysis of Occupational Exposure Data*  
4110 ([U.S. EPA 1994b](#)). The geometric standard deviation for the data was above 3.0; therefore, EPA used  
4111 the  $\frac{LOD}{2}$  to estimate the exposure value as specified in the guidelines ([U.S. EPA 1994b](#)).

4113 **Table 2-50. Summary of Worker Inhalation Monitoring Data for Use of PCE as a Wipe Cleaning**  
 4114 **Solvent and Metal/Stone Polish**

Exposure Concentration Type	Worker Exposures		Number of Worker Samples	Occupational Non-User Exposures		Number of ONU Samples	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)		Central Tendency (ppm)	High-End (ppm)		
8-hr TWA Exposure Concentration	132	228	4	2.2E-02	23	6	High
Acute Exposure Concentration (AC)	44	76		7.3E-03	7.7		
Average Daily Concentration (ADC)	30	52		5.0E-03	5.3		
Lifetime Average Daily Concentration (LADC)	12	27		2.0E-03	2.7		
15-min TWA Exposure Concentration	66	103	9	No 15-min or 4-hr data identified for ONUs			
4-hr TWA Exposure Concentration	9.5		1				

4115 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.  
 4116 Source: ([Moody et al. 1983](#); [Gunter and Lybarger 1979](#))

#### 4117 **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

4118 Exposure is assessed using PCE personal breathing zone monitoring data from two sources with a  
 4119 confidence rating of “high”, as determined through EPA’s systematic review process. There is some  
 4120 uncertainty in how representative this data is of exposure at other facilities performing wipe cleaning or  
 4121 polishing tasks. The data identified is also specific to wipe cleaning activities not polishing. Although  
 4122 the application processes are expected to be similar, the frequency and duration of polish applications  
 4123 may be less than those used for wipe cleaning. Therefore, the exposure values may overestimate  
 4124 exposures during use of polishes. Despite these uncertainties, EPA has a medium level of confidence in  
 4125 the assessed exposure for this condition of use.  
 4126

#### 4127 **2.4.1.22 Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)**

##### 4128 **Worker Activities**

4129 As previously described, workers are expected to spray PCE on to the stained textiles and then manually  
 4130 scrape away the stain using a brush or fingers.

##### 4131 **Number of Workers and Occupational Non-Users**

4132 EPA did not identify information to estimate the total number of workers and ONUs exposed from use  
 4133 of spot cleaners/spot removers. Both the Fabric Finishing GS ([U.S. EPA 1994a](#)) and the ESD on the Use  
 4134 of Textile Dyes ([OECD 2017b](#)) estimate three to six workers exposed per site. It is unknown how many  
 4135 of those workers may be involved in the spot cleaning process.  
 4136  
 4137

**Occupational Inhalation Exposure Results**

EPA identified inhalation exposure monitoring data from a single NIOSH investigation at a garment manufacturer ([Burton and Monestersky 1996](#)). It is unclear how representative these data are of a “typical” spot cleaning/spot remover scenario. Table 2-51 summarizes the 8-hr TWA monitoring data for the use of PCE in spot cleaners/spot removers.

Worker samples were determined to be any sample taken on a person while directly handling PCE. ONUs samples were determined to be any sample taken on a person in the same location as the PCE use but not handling PCE.

**Table 2-51. Summary of Worker Inhalation Exposure Monitoring Data for Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)**

Exposure Concentration Type	Worker Exposures <sup>a</sup>		Number of Worker Samples	Occupational Non-User Exposures <sup>b</sup>		Number of ONU Samples	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)		Central Tendency (ppm)	High-End (ppm)		
8-hr TWA Exposure Concentration	0.2	0.2	2	3.0E-02		1	High
Acute Exposure Concentration (AC)	5.7E-02	7.7E-02		1.0E-02	1.0E-02		
Average Daily Concentration (ADC)	3.9E-02	5.3E-02		6.8E-03	6.8E-03		
Lifetime Average Daily Concentration (LADC)	1.6E-02	2.7E-02		2.7E-03	3.5E-03		

AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> Due to only two data points identified for workers, EPA presents two scenarios: 1) using the higher of the two values; and 2) using the midpoint of the two values.

<sup>b</sup> Only one data point identified for ONUs; however, different parameters are used for calculating high-end and central tendency ADC and LADC. Therefore, a high-end and central tendency are presented based on the single data point.

Source: ([Burton and Monestersky 1996](#))

**Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

Exposure is assessed using PCE personal breathing zone monitoring data from a single source with a confidence rating of “high”, as determined through EPA’s systematic review process. There is some uncertainty in how representative this data is of exposure at other facilities performing carpet cleaning or spot remover tasks. Based on the available information above, EPA has a medium level of confidence in the assessed exposure for this condition of use.

**2.4.1.23 Other Industrial Uses**

**Worker Activities**

Based on information identified in EPA’s preliminary data gathering and information obtained from TRI and DMR, a variety of other industrial uses of PCE may exist. Based on information in the Use

Document ([U.S. EPA 2017f](#)), market profile ([U.S. EPA 2017b](#)), and NAICS/SIC codes reported in TRI ([U.S. EPA 2017k](#)) and DMR ([U.S. EPA 2016a](#)), examples of these uses include, but are not limited to, uses in textile processing, wood furniture manufacturing, foundry applications, food manufacturing, and scientific research and development. EPA did not identify information on how PCE may be used at these facilities

Although information on worker activities at these sites was not identified, EPA expects workers to perform activities similar to other industrial facilities. Therefore, workers may potentially be exposed when unloading PCE from transport containers into intermediate storage tanks and process vessels. Workers may be exposed via inhalation of vapor or via dermal contact with liquids while connecting and disconnecting hoses and transfer lines.

ONUs are employees who work at the facilities that process and use PCE, but who do not directly handle the material. ONUs may also be exposed to PCE but are expected to have lower inhalation exposures and are not expected to have dermal exposures. ONUs for this condition of use may include supervisors, managers, engineers, and other personnel in nearby production areas.

**Number of Workers and Occupational Non-Users**

EPA estimated the number of workers and occupational non-users potentially exposed during processing of PCE as a reactant using Bureau of Labor Statistics’ OES data ([U.S. BLS 2016](#)) and the U.S. Census’ SUSB ([U. S. Census Bureau 2015](#)) as well as the primary NAICS and SIC code reported by each site in the 2016 TRI or 2016 DMR, respectively (see the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)) for number of sites estimate). In the 2016 DMR ([U.S. EPA 2016a](#)) there was one site that did not report a SIC code but after review of the company’s website, EPA determined that NAICS 311411 – Frozen Fruit, Juice, and Vegetable Manufacturing was the most appropriate NAICS code to use for this site. There are approximately 2,700 workers and 1,300 ONUs potentially exposed during other industrial uses (see Table 2-52).

**Table 2-52. Estimated Number of Workers Potentially Exposed to PCE During Other Industrial Uses**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
130	21	10	2,700	1,300	4,000

<sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.

**Occupational Inhalation Exposure Results**

EPA did not identify any inhalation exposure monitoring data for the other industrial uses. Therefore, EPA assessed inhalation exposures during these uses using the Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model, assuming PCE is present at 100 percent concentration when used. Details of the model design and parameters is provided in Appendix E of the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)). Table 2-53 summarizes the model results.

The results only include values for workers as the model does not estimate ONU exposures. EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not typically directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs.

**Table 2-53. Summary of Exposure Modeling Results for Other Industrial Uses of PCE**

Exposure Concentration Type	Worker Exposures		Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)		
8-hr TWA Exposure Concentration	8.0E-03	3.6E-02	8.0E-03	N/A – modeled data
Acute Exposure Concentration (AC)	2.7E-03	1.2E-02	2.7E-03	
Average Daily Concentration (ADC)	1.8E-03	8.2E-03	1.8E-03	
Lifetime Average Daily Concentration (LADC)	7.2E-04	4.2E-03	7.2E-04	
30-min TWA Exposure Concentration	0.1	– <sup>b</sup>	0.1	
1-hr TWA Exposure Concentration	– <sup>b</sup>	0.3	– <sup>b</sup>	

AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

<sup>b</sup> High-end for short-term exposures is calculated as a 1-hr TWA and central tendency is calculated as a 30-min TWA.

### Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment

The Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model is used to estimate worker exposure. The model uses a combination of published EPA emission factors and engineering judgment to estimate central tendency and high-end exposures. EPA believes the model exposures are likely to be representative of exposure associated with bulk container loading. However, the model does not account for other potential sources of exposure at industrial facilities, such as sampling, equipment cleaning, and other process activities. The model also assumes only one container is loaded per day, although larger facilities may have higher product loading frequencies. These model uncertainties could result in an underestimate of the worker exposure. Based on reasonably available information above, EPA has a medium level of confidence in the assessed worker exposure.

Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is expected to be lower than that of workers as EPA expects ONUs to be farther from the source of exposure than workers. Therefore, EPA's confidence in the exposure estimate for ONUs is low.

#### 2.4.1.24 Other Commercial Uses

##### Worker Activities

The worker activity, use pattern, and associated exposure will vary for each condition of use. For polishes, ink removal products, and mold release, EPA expects workers may be exposed to PCE vapors that evaporate from the application material (rag, brush, etc.) or the substrate surface during use. For

4241 inks, workers may be exposed to mists generated during the ink application process. For photographic  
 4242 film, workers may be exposed to PCE that evaporates from the gating process.

4243  
 4244 **Number of Workers and Occupational Non-Users**

4245 EPA has not identified information on the number of sites and potentially exposed workers associated  
 4246 with these uses. The use of PCE for these conditions of use is expected to be minimal.

4247  
 4248 **Occupational Inhalation Exposure Results**

4249 EPA assessed exposure to other commercial uses of PCE using data from identified studies. EPA  
 4250 identified exposure data for printing uses (inks and ink removal products), photocopy shops,  
 4251 photographic film, and mold release uses. Table 2-54 summarizes the 8-hr TWA and 15-min TWA data  
 4252 identified for these uses. Note: Data for mold release products are area samples not worker breathing  
 4253 zone samples; it is unclear how representative area samples are of actual exposures.

4254  
 4255 Worker samples were determined to be any sample taken on a person while directly handling PCE.  
 4256 ONUs samples were determined to be any sample taken on a person in the same location as the PCE use  
 4257 but not handling PCE. The results only include values for workers as monitoring data for ONUs were  
 4258 not identified. EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not  
 4259 typically directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency  
 4260 exposure results as a surrogate to estimate exposures for ONUs.

4261  
 4262 **Table 2-54. Summary of Exposure Monitoring Data for Other Commercial Uses of PCE**

Scenario	Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
		Central Tendency (ppm)	High-End (ppm)			
Printing Applications (Ink and Ink Removal Products)	8-hr TWA Exposure Concentration	1.9	5.9	23	1.9	Medium to High
	Acute Exposure Concentration (AC)	0.6	2.0		0.6	
	Average Daily Concentration (ADC)	0.4	1.4		0.4	
	Lifetime Average Daily Concentration (LADC)	0.2	0.7		0.2	
	15-min TWA Exposure Concentration	0.2		1	0.2	
Photocopying	8-hr TWA Exposure Concentration	1.9E-04	5.0E-04	3	1.9E-04	High
	Acute Exposure Concentration (AC)	6.3E-05	1.7E-04		6.3E-05	



Scenario	Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
		Central Tendency (ppm)	High-End (ppm)			
	Average Daily Concentration (ADC)	4.3E-05	1.1E-04		4.3E-05	
	Lifetime Average Daily Concentration (LADC)	1.7E-05	5.9E-05		1.7E-05	
Photographic Film Applications	8-hr TWA Exposure Concentration	6.3	56	62	6.3	Medium
	Acute Exposure Concentration (AC)	2.1	19		2.1	
	Average Daily Concentration (ADC)	1.4	13		1.4	
	Lifetime Average Daily Concentration (LADC)	0.6	6.6		0.6	
	15-min TWA Exposure Concentration	13	117	40	13	
Mold Release Products	8-hr TWA Exposure Concentration	0.1	0.2	4	0.1	High
	Acute Exposure Concentration (AC)	3.3E-02	6.7E-02		3.3E-02	
	Average Daily Concentration (ADC)	2.3E-02	4.6E-02		2.3E-02	
	Lifetime Average Daily Concentration (LADC)	9.1E-03	2.3E-02		9.1E-03	

4263 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.  
 4264 <sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses  
 4265 worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of  
 4266 this value for ONUs is unknown.  
 4267 Source: ([Gold et al. 2008](#); [NIOSH 1980](#))  
 4268

4269 **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

4270 For printing applications, photocopying, and photographic film applications, worker exposure is  
 4271 assessed using PCE personal breathing zone monitoring data from multiple sources with confidence  
 4272 ratings ranging from “medium” to “high”, as determined through EPA’s systematic review process. EPA

4273 has a medium to high level of confidence in the assessed worker exposure for these uses based on the  
4274 strength of the monitoring data.

4275  
4276 For mold release products, worker exposure is assessed using PCE area monitoring data from a single  
4277 source with a confidence rating of “high”, as determined through EPA’s systematic review process.  
4278 There is some uncertainty in how representative the area samples are of actual exposures. Based on the  
4279 above information, EPA has a medium confidence in the assessed worker exposure for this use.

4280  
4281 Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical  
4282 representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is  
4283 expected to be lower than that of workers as EPA expects ONUs to be farther from the source of  
4284 exposure than workers. Therefore, EPA’s confidence in the exposure estimate for ONUs is low.

#### 4285 **2.4.1.25 Laboratory Chemicals**

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##### 4286 **Worker Activities**

4287 Specific worker activities for using laboratory uses were not identified, but EPA expects that workers  
4288 may be potentially exposed to PCE in laboratories during multiple activities, including unloading of  
4289 PCE from the containers in which they were received, transferring PCE into laboratory equipment (i.e.,  
4290 beakers, flasks, other intermediate storage containers), dissolving substances into PCE or otherwise  
4291 preparing samples that contain PCE, analyzing these samples, and discarding the samples.

4292  
4293 ONUs for this condition of use include supervisors, managers, and other employees that may be in the  
4294 laboratory but do not perform tasks that result in the same level of exposures as those workers that  
4295 engage in tasks related to the use of PCE.

##### 4296 **Number of Workers and Occupational Non-Users**

4297 EPA did not identify information to estimate the total number of workers exposed to PCE at laboratory  
4298 facilities. However, EPA estimated the number of workers and ONUs per site using information from  
4299 the Bureau of Labor Statistics’ OES data ([U.S. BLS 2016](#)) and the U.S. Census’ SUSB ([U. S. Census  
4300 Bureau 2015](#)). EPA identified the NAICS code 541380, Testing Laboratories, as the code expected to  
4301 include laboratory chemical uses of PCE. Based on data from the BLS for this NAICS code and related  
4302 SOC codes, there are an average of one worker and nine ONUs per site, or a total of ten potentially  
4303 exposed workers and ONUs per site.

##### 4304 **Occupational Inhalation Exposure Results**

4305  
4306 EPA does not have reasonable available information to assess worker exposures to PCE during  
4307 laboratory use. However, due to the expected safety practices when using chemicals in a laboratory  
4308 setting, PCE is expected to be applied in small amounts under a fume hood, thus reducing the potential  
4309 for inhalation exposures.

#### 4310 **2.4.1.26 Waste Handling, Disposal, Treatment, and Recycling**

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##### 4311 **Worker Activities**

4312 At waste disposal sites, workers are potentially exposed via dermal contact with waste containing PCE  
4313 or via inhalation of PCE vapor. Depending on the concentration of PCE in the waste stream, the route  
4314 and level of exposure may be similar to that associated with container unloading activities. See Section  
4315 2.4.1.23 for the assessment of worker exposure from chemical unloading activities.

4318 **Number of Workers and Occupational Non-Users**  
 4319 EPA estimated the number of workers and occupational non-users potentially exposed during  
 4320 disposal/treatment of PCE using Bureau of Labor Statistics' OES data ([U.S. BLS 2016](#)) and the U.S.  
 4321 Census' SUSB ([U. S. Census Bureau 2015](#)) as well as the primary NAICS and SIC code reported by  
 4322 each site in the 2016 TRI or 2016 DMR, respectively. There are approximately 1,600 workers and 700  
 4323 ONUs potentially exposed during disposal/treatment of PCE wastes (see Table 2-55)  
 4324

4325 **Table 2-55. Estimated Number of Workers Potentially Exposed to PCE During Waste Handling,**  
 4326 **Disposal, Treatment, and Recycling**

Number of Sites	Exposed Workers per Site	Exposed Occupational Non-Users per Site	Total Exposed Workers <sup>a</sup>	Total Exposed Occupational Non-Users <sup>a</sup>	Total Exposed <sup>a</sup>
94	17	7	1,600	700	2,300

4327 <sup>a</sup> Totals have been rounded to two significant figures. Totals may not add exactly due to rounding.  
 4328

4329 **Occupational Inhalation Exposure Results**

4330 EPA did not identify any inhalation exposure monitoring data for disposal/treatment. Therefore, EPA  
 4331 assessed inhalation exposures during these uses using the Tank Truck and Railcar Loading and  
 4332 Unloading Release and Inhalation Exposure Model, assuming PCE is present at 100 percent  
 4333 concentration when used. Details of the model design and parameters is provided in Appendix E of the  
 4334 *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene,*  
 4335 *1,1,2,2,-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report) ([U.S. EPA 2020d](#)). Table  
 4336 2-56 summarizes the model results.  
 4337

4338 The results only include values for workers as the model does not estimate ONU exposures. EPA  
 4339 estimates that ONU exposures are lower than worker exposures, since ONUs do not typically directly  
 4340 handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency exposure results  
 4341 as a surrogate to estimate exposures for ONUs.  
 4342

4343 **Table 2-56. Summary of Exposure Modeling Results for Waste Handling, Disposal, Treatment,**  
 4344 **and Recycling**

Exposure Concentration Type	Worker Exposures		Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)		
8-hr TWA Exposure Concentration	8.0E-03	3.6E-02	8.0E-03	N/A – modeled data
Acute Exposure Concentration (AC)	2.7E-03	1.2E-02	2.7E-03	
Average Daily Concentration (ADC)	1.8E-03	8.2E-03	1.8E-03	
Lifetime Average Daily Concentration (LADC)	7.2E-04	4.2E-03	7.2E-04	
30-min TWA Exposure Concentration	0.1	– <sup>b</sup>	0.1	
1-hr TWA Exposure Concentration	– <sup>b</sup>	0.3	– <sup>b</sup>	

4345 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

<sup>b</sup> High-end for Acute exposures is calculated as a 1-hr TWA and central tendency is calculated as a 30-min TWA.

### **Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

The Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model is used to estimate worker exposure. The model uses a combination of published EPA emission factors and engineering judgment to estimate central tendency and high-end exposures. EPA believes the model exposures are likely to be representative of exposure associated with bulk container loading. However, the model does not account for other potential sources of exposure at industrial facilities, such as sampling, equipment cleaning, and other process activities. The model also assumes only one container is loaded per day, although larger facilities may have higher product loading frequencies. These model uncertainties could result in an underestimate of the worker exposure. Based on reasonably available information above, EPA has a medium level of confidence in the assessed worker exposure.

Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is expected to be lower than that of workers as EPA expects ONUs to be farther from the source of exposure than workers. Therefore, EPA's confidence in the exposure estimate for ONUs is low.

#### **2.4.1.27 Other Department of Defense Uses**

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EPA reached out to the Department of Defense (DoD) for monitoring data for the first 10 chemical substances that are the subject of the Agency's initial chemical risk evaluations. The DoD provided monitoring data from its Defense Occupational and Environmental Health Readiness System – Industrial Hygiene (DOEHRS-IH), which collects occupational and environmental health risk data from each service branch. The DoD provided inhalation monitoring data for three branches of the military: Army, Air Force, and Navy ([U.S. DOD and Environmental Health Readiness System - Industrial 2018](#)). These data are not distinguished among the three branches.

Where the condition of use of the collected monitoring data could be clearly determined and fit into one of the conditions of use assessed in Sections 2.4.1.6 through 2.4.1.26. The following conditions of use include DoD data:

- Aerosol Degreasing;
- Dry Cleaning;
- Adhesives, Sealants, Paints, and Coatings; and
- Chemical Maskants.

This section provides analysis of additional DoD data that did not fit into another previously identified condition of use.

#### **Worker Activities**

The DoD data did not provide worker activities for these data.

#### **Number of Workers and Occupational Non-Users**

The DoD data did not provide information to estimate the number of workers and ONUs exposed from these uses.

4393 **Occupational Inhalation Results**

4394 EPA assessed exposures from two processes in the DoD data: oil analysis and water pipe repair. The  
 4395 sample times for other processes in the dataset were less than 50% of an 8-hr shift (assumed shift-time  
 4396 for these activities) and, therefore, may not be representative of actual 8-hr TWA exposures. Therefore,  
 4397 EPA could not estimate exposures for these processes.

4398  
 4399 *Oil Analysis*

4400 For the oil analysis process, one data point was available; however, different parameters are used for  
 4401 calculating high-end and central tendency ADC and LADC. Therefore, a high-end and central tendency  
 4402 are presented based on the single data point.

4403  
 4404 EPA adjusted the exposure frequency when calculating ADC and LADC to reflect the expected number  
 4405 of exposure days based on the process frequency reported by DoD. For the oil analysis the frequency  
 4406 was two to three times per week. EPA used the midpoint of the ranges to estimate the central tendency  
 4407 ADC and LADC and the maximum frequency to calculate the high-end ADC and LADC. This resulted  
 4408 in 150 exposure days/yr at the high-end and 125 exposure days at the central tendency for the oil  
 4409 analysis.

4410  
 4411 Worker samples were determined to be any sample taken on a person while directly handling PCE.  
 4412 ONUs samples were determined to be any sample taken on a person in the same location as the PCE use  
 4413 but not handling PCE. The results only include values for workers as monitoring data for ONUs were  
 4414 not identified. EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not  
 4415 typically directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency  
 4416 exposure results as a surrogate to estimate exposures for ONUs.

4417  
 4418 **Table 2-57. Summary of Inhalation Monitoring Data for Other DoD Uses (Oil Analysis) of PCE**

Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Central Tendency (ppm)	High-End (ppm)			
8-hr TWA Exposure Concentration	0.9 <sup>b</sup>		1	0.9	High
Acute Exposure Concentration (AC)	0.3	0.3		0.3	
Average Daily Concentration (ADC)	0.1	0.1		0.1	
Lifetime Average Daily Concentration (LADC)	4.0E-02	6.2E-02		4.0E-02	
15-min TWA Exposure Concentration	4.2		1	4.2	
1-hr TWA Exposure Concentration	6.6		1	6.6	

4419 AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

4420 <sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses  
 4421 worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of  
 4422 this value for ONUs is unknown.

4423 <sup>b</sup> Only one data point identified for oil analysis. However, different parameters are used for calculating high-end and central  
 4424 tendency ADC and LADC. Therefore, a high-end and central tendency are presented based on the single data point.

Source: ([U.S. DOD and Environmental Health Readiness System - Industrial 2018](#))

*Water Pipe Repair*

For the water pipe repair, there was only one data point available as well; however, it measured below the LOD. To estimate values below the LOD, EPA referenced the *Guidelines for Statistical Analysis of Occupational Exposure Data* ([U.S. EPA 1994b](#)). However, there is only a single data point, so the geometric standard deviation is not statistically meaningful. Therefore, EPA assesses the exposure as ranging from zero to the LOD (2.31 ppm) and presents two scenarios: 1) using the LOD as a “higher value”; and 2) using half the LOD as a “midpoint” value.

EPA adjusted the exposure frequency when calculating ADC and LADC to reflect the expected number of exposure days based on the process frequency reported by DoD. For the water pipe repair the frequency was two to three times per month. EPA used the midpoint of the ranges to estimate the central tendency ADC and LADC and the maximum frequency to calculate the high-end ADC and LADC. This resulted in 36 exposure days/yr at the high-end and 30 exposure days at the central tendency for the water pipe repair.

Worker samples were determined to be any sample taken on a person while directly handling PCE. ONUs samples were determined to be any sample taken on a person in the same location as the PCE use but not handling PCE. The results only include values for workers as monitoring data for ONUs were not identified. EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not typically directly handle the chemical. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs.

**Table 2-58. Summary of Inhalation Monitoring Data for Other DoD Uses (Water Pipe Repair) of PCE**

Exposure Concentration Type	Worker Exposures		Number of Samples	Occupational Non-User Exposures (ppm) <sup>a</sup>	Data Quality Rating of Air Concentration Data
	Midpoint Value (ppm)	Higher Value (ppm)			
8-hr TWA Exposure Concentration	1.2	2.3	1	1.2	High
Acute Exposure Concentration (AC)	0.4	0.8		0.4	
Average Daily Concentration (ADC)	3.2E-02	7.6E-02		3.2E-02	
Lifetime Average Daily Concentration (LADC)	1.3E-02	3.9E-02		1.3E-02	

AC = Acute Concentration; ADC = Average Daily Concentration; and LADC = Lifetime Average Daily Concentration.

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

Source: ([U.S. DOD and Environmental Health Readiness System - Industrial 2018](#))

**Strength, Limitation, and Uncertainty of the Inhalation Exposure Assessment**

Exposure to workers is assessed using PCE personal breathing zone monitoring data from DoD which has a confidence rating of “high”, as determined through EPA’s systematic review process. The data is

4460 directly applicable to the use being assessed. For the water pipe repair there is some uncertainty in the  
4461 assessed values as the measurement was below the LOD. Despite this uncertainty, EPA has a high level  
4462 of confidence in the assessed worker exposure for these uses based on the strength of the monitoring  
4463 data.

4464  
4465 Exposure to ONUs is assessed using the worker central tendency exposure values. The statistical  
4466 representativeness of this value for ONUs is unknown; however, the central tendency for ONUs is  
4467 expected to be lower than that of workers as EPA expects ONUs to be farther from the source of  
4468 exposure than workers. Therefore, EPA's confidence in the exposure estimate for ONUs is low.

#### 4469 **2.4.1.28 Summary of Inhalation Exposure Assessment**

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4470 The following table summarizes the inhalation exposure estimates for all occupational exposure  
4471 scenarios. Where statistics can be calculated, the central tendency estimate represents the 50<sup>th</sup> percentile  
4472 exposure level of the available data set, and the high-end estimate represents the 95<sup>th</sup> percentile exposure  
4473 level.

4474 **Table 2-59. Summary of Inhalation Exposure Results**

Condition of Use	Category	8- or 12-Hour TWA Exposures (ppm)		AC (ppm)		ADC (ppm)		LADC (ppm)		Statistical Value for Central Tendency and High-End	Data Type
		High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency		
Manufacturing (8-hr TWA)	Worker	2.6	3.3E-02	0.9	1.1E-02	0.6	7.4E-03	0.3	2.9E-03	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Manufacturing (8-hr TWA)	ONU <sup>a</sup>	3.3E-02		1.1E-02		7.4E-03		2.9E-03		Unknown	Worker Central Tendency
Manufacturing (12-hr TWA)	Worker	0.2	2.1E-02	0.1	1.0E-02	7.3E-02	7.0E-03	3.7E-03	2.8E-03	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Manufacturing (12-hr TWA)	ONU <sup>a</sup>	2.1E-02		1.0E-02		7.0E-03		2.8E-03		Unknown	Worker Central Tendency
Repackaging	Worker	0.8	0.4	0.3	0.1	0.2	9.9E-02	9.6E-02	3.9E-02	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Repackaging	ONU <sup>a</sup>	0.4		0.1		9.9E-02		3.9E-02		Unknown	Worker Central Tendency
Processing as Reactant/ Intermediate (8-hr TWA)	Worker	2.6	3.3E-02	0.9	1.1E-02	0.6	7.4E-03	0.3	2.9E-03	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Processing as Reactant/ Intermediate (8-hr TWA)	ONU <sup>a</sup>	3.3E-02		1.1E-02		7.4E-03		2.9E-03		Unknown	Worker Central Tendency
Processing as Reactant/ Intermediate (12-hr TWA)	Worker	0.2	2.1E-02	0.1	1.0E-02	7.3E-02	7.0E-03	3.7E-03	2.8E-03	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Processing as Reactant/ Intermediate (12-hr TWA)	ONU <sup>a</sup>	2.1E-02		1.0E-02		7.0E-03		2.8E-03		Unknown	Worker Central Tendency
Incorporation into Formulation - Aerosol Packing	Worker	13	8.3	4.4	2.8	3.0	1.9	1.5	0.8	Median and Maximum	Monitoring Data



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Condition of Use	Category	8- or 12-Hour TWA Exposures (ppm)		AC (ppm)		ADC (ppm)		LADC (ppm)		Statistical Value for Central Tendency and High-End	Data Type
		High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency		
Incorporation into Formulation - Aerosol Packing	ONU <sup>a</sup>	8.3		2.8		1.9		0.8		Unknown	Worker Central Tendency
Incorporation into Formulation - Degreasing Solvent	Worker	2.6	0.7	0.4	0.1	5.7E-02	1.6E-02	8.4E-03	2.3E-03	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Incorporation into Formulation - Degreasing Solvent	ONU <sup>a</sup>	0.7		0.1		1.6E-02		2.3E-03		Unknown	Worker Central Tendency
Incorporation into Formulation - Dry Cleaning Solvent	Worker	14	4.0	2.1	0.6	0.3	8.6E-02	4.5E-02	1.3E-02	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Incorporation into Formulation - Dry Cleaning Solvent	ONU <sup>a</sup>	4.0		0.6		8.6E-02		1.3E-02		Unknown	Worker Central Tendency
Incorporation into Formulation - Miscellaneous	Worker	1.4	0.4	0.2	5.9E-02	3.1E-02	8.6E-03	4.5E-03	1.3E-03	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Incorporation into Formulation - Miscellaneous	ONU <sup>a</sup>	0.4		5.9E-02		8.6E-03		1.3E-03		Unknown	Worker Central Tendency

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Condition of Use	Category	8- or 12-Hour TWA Exposures (ppm)		AC (ppm)		ADC (ppm)		LADC (ppm)		Statistical Value for Central Tendency and High-End	Data Type
		High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency		
OTVD	Worker	32	2.1	11	0.7	7.3	0.5	3.8	0.2	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
OTVD	ONU	5.2	0.6	1.7	0.2	1.2	0.1	0.6	5.5E-02	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Closed Loop Vapor Degreasing	Worker	0.3	7.2E-02	8.4E-02	2.4E-02	5.8E-02	1.6E-02	3.0E-02	6.6E-03	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Closed Loop Vapor Degreasing	ONU	0.1	6.5E-02	3.2E-02	2.2E-02	2.2E-02	1.5E-02	1.1E-02	5.9E-03	Median and Maximum	Monitoring Data
Conveyorized Vapor Degreasing	Worker	186	78	62	26	42	18	17	6.7	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Conveyorized Vapor Degreasing	ONU	126	41	42	14	29	9.3	12	3.5	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Web Degreasing	Worker	1.8	0.6	0.6	0.2	0.4	0.1	0.2	5.3E-02	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Web Degreasing	ONU	1.3	0.3	0.4	0.1	0.3	7.3E-02	0.1	2.7E-02	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Cold Cleaning	Worker	4.1	1.4	1.4	0.5	0.9	0.3	0.5	0.1	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Cold Cleaning	Worker	1.5	2.4E-03	0.5	8.0E-04	0.4	5.5E-04	0.1	2.0E-04	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Cold Cleaning	ONU	0.8	1.2E-03	0.3	4.1E-04	0.2	2.8E-04	6.7E-02	1.1E-04	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)

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Condition of Use	Category	8- or 12-Hour TWA Exposures (ppm)		AC (ppm)		ADC (ppm)		LADC (ppm)		Statistical Value for Central Tendency and High-End	Data Type
		High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency		
Aerosol Degreasing/Lubricants	Worker	7.8	1.4	2.6	0.5	1.8	0.3	0.9	0.1	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Aerosol Degreasing/Lubricants	Worker	17	5.5	5.7	1.8	3.9	1.3	1.6	0.5	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Aerosol Degreasing/Lubricants	ONU	0.7	0.1	0.2	3.4E-02	0.2	2.0E-02	7.0E-02	1.0E-02	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Post-2006 NESHAP Dry Cleaning	Worker	20	3.6	6.5	1.2	5.2	0.9	2.7	0.3	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Post-2006 NESHAP Dry Cleaning	ONU	0.3	0.3	0.1	0.1	9.3E-02	8.2E-02	4.8E-02	3.3E-02	N/A (one data point)	Monitoring Data
4th/5th Gen Only Dry Cleaning	Worker	5.6	1.0	1.9	0.3	1.5	0.2	0.8	9.2E-02	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
4th/5th Gen Only Dry Cleaning	ONU	0.1	1.4E-02	4.1E-02	4.7E-03	3.3E-02	3.3E-03	1.7E-02	1.3E-03	Median and Maximum	Monitoring Data
Dry Cleaning (12-hr TWA)	Worker	30	1.4	15	0.7	10	0.5	4.1	0.2	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Dry Cleaning (12-hr TWA)	ONU	1.5	0.1	0.8	5.4E-02	0.6	3.8E-02	0.2	1.4E-02	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Model (probabilistic)
Paints/Coatings	Worker	4.6	0.2	1.5	7.8E-02	1.0	5.3E-02	0.5	2.1E-02	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Paints/Coatings	ONU <sup>a</sup>	0.2		7.8E-02		5.3E-02		2.1E-02		Unknown	Worker Central Tendency

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Condition of Use	Category	8- or 12-Hour TWA Exposures (ppm)		AC (ppm)		ADC (ppm)		LADC (ppm)		Statistical Value for Central Tendency and High-End	Data Type
		High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency		
Adhesives	Worker	0.8	8.8E-02	0.3	2.9E-02	0.2	2.0E-02	9.5E-02	8.0E-03	Arithmetic Mean and Maximum	Monitoring Data
Adhesives	ONU <sup>a</sup>	8.8E-02		2.9E-02		2.0E-02		8.0E-03		Unknown	Worker Central Tendency
Chemical Maskant	Worker	2.1	1.2	0.7	0.4	0.5	0.3	0.2	0.1	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Chemical Maskant	ONU <sup>a</sup>	1.2		0.4		0.3		0.1		Unknown	Worker Central Tendency
Industrial Processing Aid	Worker	1.2	6.0E-02	0.4	2.0E-02	0.3	1.4E-02	0.1	5.4E-03	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Industrial Processing Aid	ONU <sup>a</sup>	6.0E-02		2.0E-02		1.4E-02		5.4E-03		Unknown	Worker Central Tendency
Other Industrial Uses	Worker	3.6E-02	8.0E-03	1.2E-02	2.7E-03	8.2E-03	1.8E-03	4.2E-03	7.2E-04	N/A – CT and HE <sup>b</sup>	Model (deterministic)
Other Industrial Uses	ONU <sup>a</sup>	8.0E-03		2.7E-03		1.8E-03		7.2E-04		Unknown	Worker Central Tendency
Metalworking Fluid	Worker	2.1E-02	5.8E-03	7.0E-03	1.9E-03	4.8E-03	1.3E-03	2.5E-03	5.2E-04	Geometric mean and 90 <sup>th</sup> percentile	ESD
Metalworking Fluid	ONU <sup>a</sup>	5.8E-03		1.9E-03		1.3E-03		5.2E-04		Unknown	Worker Central Tendency
Wipe Cleaning and Metal/Stone Polishes	Worker	228	132	76	44	52	30	27	12	Median and Maximum	Monitoring Data
Wipe Cleaning and Metal/Stone Polishes	ONU	23	2.2E-02	7.7	7.3E-03	5.3	5.0E-03	2.7	2.0E-03	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data

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Condition of Use	Category	8- or 12-Hour TWA Exposures (ppm)		AC (ppm)		ADC (ppm)		LADC (ppm)		Statistical Value for Central Tendency and High-End	Data Type
		High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency		
Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	Worker	0.2	0.2	7.7E-02	5.7E-02	5.3E-02	3.9E-02	2.7E-02	1.6E-02	Median and Maximum	Monitoring Data
Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	ONU	3.0E-02 <sup>c</sup>		1.0E-02	1.0E-02	6.8E-03	6.8E-03	3.5E-03	2.7E-03	N/A (one data point)	Monitoring Data
Other Commercial Uses - Printing	Worker	5.9	1.9	2.0	0.6	1.4	0.4	0.7	0.2	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data
Other Commercial Uses - Printing	ONU <sup>a</sup>	1.9		0.6		0.4		0.2		Unknown	Worker Central Tendency
Other Commercial Uses - Photocopying	Worker	5.0E-04	1.9E-04	1.7E-04	6.3E-05	1.1E-04	4.3E-05	5.9E-05	1.7E-05	Median and Maximum	Monitoring Data
Other Commercial Uses - Photocopying	ONU <sup>a</sup>	1.9E-04		6.3E-05		4.3E-05		1.7E-05		Unknown	Worker Central Tendency
Other Commercial Uses - Photographic Film	Worker	56	6.3	19	2.1	13	1.4	6.6	0.6	50 <sup>th</sup> and 95 <sup>th</sup> Percentile	Monitoring Data

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Condition of Use	Category	8- or 12-Hour TWA Exposures (ppm)		AC (ppm)		ADC (ppm)		LADC (ppm)		Statistical Value for Central Tendency and High-End	Data Type
		High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency	High-End	Central Tendency		
Other Commercial Uses - Photographic Film	ONU <sup>a</sup>	6.3		2.1		1.4		0.6		Unknown	Worker Central Tendency
Other Commercial Uses - Mold Release	Worker	0.2	0.1	6.7E-02	3.3E-02	4.6E-02	2.3E-02	2.3E-02	9.1E-03	Arithmetic Mean and Maximum	Monitoring Data
Other Commercial Uses - Mold Release	ONU <sup>a</sup>	0.1		3.3E-02		2.3E-02		9.1E-03		Unknown	Worker Central Tendency
Other DOD Uses - Water Pipe Repair	Worker	2.3	1.2	0.8	0.4	7.6E-02	3.2E-02	3.9E-02	1.3E-02	Half the LOD and the LOD	Monitoring Data
Other DOD Uses - Water Pipe Repair	ONU <sup>a</sup>	1.2		0.4		3.2E-02		1.3E-02		Unknown	Worker Central Tendency
Other DOD Uses - Oil analysis	Worker	0.9 <sup>c</sup>		0.3	0.3	0.1	0.1	6.2E-02	4.0E-02	N/A (one data point)	Monitoring Data
Other DOD Uses - Oil analysis	ONU <sup>a</sup>	0.9		0.3		0.1		4.0E-02		Unknown	Worker Central Tendency
Disposal/ Recycling	Worker	3.6E-02	8.0E-03	1.2E-02	2.7E-03	8.2E-03	1.8E-03	4.2E-03	7.2E-04	N/A – CT and HE <sup>b</sup>	Model (deterministic)
Disposal/ Recycling	ONU <sup>a</sup>	8.0E-03		2.7E-03		1.8E-03		7.2E-04		Unknown	Worker Central Tendency

4475  
4476  
4477  
4478

<sup>a</sup> EPA did not identify monitoring data or models to estimate exposures for ONUs. In lieu of ONU-specific data, EPA uses worker central tendency exposure results as a surrogate to estimate exposures for ONUs. The statistical representativeness of this value for ONUs is unknown.

<sup>b</sup> Based on distinct model scenarios that are likely representative of central tendency (CT) and high-end (HE) exposures.

<sup>c</sup> Only a single data point was available for this condition of use.

2.4.1.29 Dermal Exposure Assessment

Dermal absorption of PCE depends on the type and duration of exposure. Where exposure is non-occluded, only a fraction of PCE that comes into contact with the skin will be absorbed as the chemical readily evaporates from the skin. However, dermal exposure may be significant in cases of occluded exposure, repeated contacts, or dermal immersion. For example, work activities with a high degree of splash potential may result in PCE liquids trapped inside the gloves, inhibiting the evaporation of PCE and increasing the exposure duration.

To assess exposure, EPA used the *Dermal Exposure to Volatile Liquids Model* (see following equation and Appendix K of the *Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene (Ethene, 1,1,2,2-Tetrachloro) CASRN: 127-18-4* (Supplemental Engineering Report (U.S. EPA 2020d)) to calculate the dermal retained dose. The equation modifies *EPA/OPPT 2-Hand Dermal Exposure to Liquids Model* (peer reviewed) by incorporating a “fraction absorbed ( $f_{abs}$ )” parameter to account for the evaporation of volatile chemicals and a “protection factor (PF)” to account for glove use:

$$D_{exp} = \frac{S \times (Q_u \times f_{abs}) \times Y_{derm} \times FT}{PF \times BW}$$

Where:

- $D_{exp}$  is the dermal retained dose (mg/kg-day)
- S is the surface area of contact (cm<sup>2</sup>)
- $Q_u$  is the quantity remaining on the skin after an exposure event (mg/cm<sup>2</sup>-event)
- $Y_{derm}$  is the weight fraction of the chemical of interest in the liquid ( $0 \leq Y_{derm} \leq 1$ )
- FT is the frequency of events (integer number per day)
- $f_{abs}$  is the fraction of applied mass that is absorbed (Default for PCE: 0.13 for industrial facilities and 0.19 for commercial facilities<sup>13</sup>)
- PF is the glove protection factor (Default: see Table 2-60)
- BW is the body weight (Default: 80 kg)

Default glove PF values, which vary depending on the type of glove used and the presence of employee training program, are shown in Table 2-60.

**Table 2-60. Glove Protection Factors for Different Dermal Protection Strategies**

Dermal Protection Characteristics	Setting	Protection Factor, PF
a. No gloves used, or any glove / gauntlet without permeation data and without employee training	Industrial and Commercial Uses	1
b. Gloves with available permeation data indicating that the material of construction offers good protection for the substance		5
c. Chemically resistant gloves (i.e., as b above) with “basic” employee training		10
d. Chemically resistant gloves in combination with specific activity training (e.g., procedure for glove removal and disposal) for tasks where dermal exposure can be expected to occur	Industrial Uses Only	20

<sup>13</sup> The absorbed fraction ( $f_{abs}$ ) is a function of indoor air speed, which differs for industrial and commercial settings.

Source: ([Marquart et al. 2017](#))

Table 2-61 presents the estimated dermal acute retained dose for *workers* in various exposure scenarios, including what-if scenarios for glove use. The dose estimates assume one exposure event (applied dose) per work day and that 13 to 19 percent of the applied dose is absorbed through the skin. The exposure estimates are provided for each condition of use, where the conditions of uses are “binned” based on the maximum possible exposure concentration ( $Y_{\text{derm}}$ ) and the likely level of exposure. The exposure concentration is determined based on EPA’s review of currently available products and formulations containing PCE:

- **Bin 1:** Bin 1 covers industrial uses that generally occur in closed systems. For these uses, dermal exposure is likely limited to chemical loading/unloading activities (e.g. connecting hoses) and taking quality control samples.
- **Bin 2:** Bin 2 covers industrial degreasing and chemical maskant uses, which are not closed systems. For these uses, there is greater opportunity for dermal exposure during activities such as charging and draining degreasing/milling equipment, drumming waste solvent, handling recycled/re-captured maskants, and removing waste sludge.
- **Bin 3:** Bin 3 covers aerosol uses, where workers are likely to have direct dermal contact with film applied to substrate and incidental deposition of aerosol to skin.
- **Bin 4:** Bin 4 covers commercial activities of similar maximum concentration. Most of these uses are uses at dry cleaners, and/or uses expected to have direct dermal contact with bulk liquids. At dry cleaning shops, workers may be exposed to bulk liquids while charging and draining solvent to/from machines, removing and disposing sludge, and maintaining equipment. Workers can also be exposed to PCE used in spot cleaning products at the same shop.
- **Bin 5:** Bin 5 covers uses of metalworking fluids containing PCE. These product formulations are expected to be used in industrial settings and workers may be exposed when unloading the metalworking fluid from containers; transferring fluids to the trough; and performing metal shaping operations.
- **Bin 6:** Bin 6 covers uses of adhesives, sealants, paints, and coatings containing PCE. These product formulations may have both industrial and commercial uses and workers may be exposed when mixing coating/adhesive, charging products to application equipment (e.g., spray guns, roll applicators, etc.), and cleaning application equipment. Other workers may also have incidental contact with applied products during subsequent fabrication steps.

Dermal exposure to liquid is not expected for occupational non-users, as they do not directly handle PCE.

### **Strength, Limitation, and Uncertainty of the Dermal Exposure Assessment**

Dermal exposures are assessed using *the Dermal Exposure to Volatile Liquids Model*, which relies on the theoretical framework presented by Kasting and Miller ([2006](#)) to estimate the fractional absorption in accounting for chemical volatilization. EPA has a medium level of confidence in the assessed baseline exposure. Glove protection factors are presented as what-if scenarios to show the potential effect of glove use on exposure levels. EPA does not know the actual frequency, type, and effectiveness of glove use in specific workplaces with PCE conditions of use.



4555

**Table 2-61. Estimated Dermal Acute Retained Dose for Workers in All Conditions of Use**

Exposure Scenario	Bin	Max Y <sub>derm</sub>	Dermal Exposure (mg/kg-day)			
			No Gloves (PF = 1)	Protective Gloves (PF = 5)	Protective Gloves (PF = 10)	Protective Gloves (Industrial uses, PF = 20)
Manufacture	Bin 1	1.0	1.2 (CT) 3.5(HE)	0.2 (CT) 0.7 (HE)	0.1 (CT) 0.4 (HE)	5.9E-02 (CT) 0.2 (HE)
Import/Repackaging						
Processing as a Reactant						
Incorporation into Formulation, Mixture, or Reaction Product						
Industrial Processing Aid						
Other Industrial Uses						
Waste Handling, Disposal, Treatment, and Recycling						
Batch Open-Top Vapor Degreasing	Bin 2	1.0	1.2(CT) 3.5 (HE)	0.2 (CT) 0.7 (HE)	0.1 (CT) 0.4 (HE)	5.9E-02 (CT) 0.2 (HE)
Batch Closed-Loop Vapor Degreasing						
Conveyorized Vapor Degreasing						
Web Degreasing						
Cold Cleaning						
Maskant for Chemical Milling						
Aerosol Degreasing and Aerosol Lubricants	Bin 3	1.0	1.8 (CT) 5.3 (HE)	0.4 (CT) 1.1 (HE)	0.2 (CT) 0.5 (HE)	N/A

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Exposure Scenario	Bin	Max Y <sub>derm</sub>	Dermal Exposure (mg/kg-day)			
Dry Cleaning and Spot Cleaning	Bin 4	1.0	1.8 (CT) 5.4 (HE)	0.4 (CT) 1.1 (HE)	0.2 (CT) 0.5 (HE)	N/A
Wipe Cleaning and Metal/Stone Polishes						
Other Spot Cleaning/Spot Remover						
Other Commercial Uses						
Metalworking Fluids	Bin 5	0.10	0.1 (CT) 0.4 (HE)	2.5E-02 (CT) 7.1E-02 (HE)	1.2E-02 (CT) 3.5E-02 (HE)	5.9E-03 (CT) 1.8E-02 (HE)
Adhesives, Sealants, Paints, and Coatings (Industrial)	Bin 6	0.80	0.9 (CT) 2.8 (HE)	0.2 (CT) 0.6 (HE)	9.4E-02 (CT) 0.3 (HE)	4.7E-02 (CT) 0.1 (HE)
Adhesives, Sealants, Paints, and Coatings (Commercial)		0.80	1.4 (CT) 4.3 (HE)	0.3 (CT) 0.9 (HE)	0.1 (CT) 0.4 (HE)	N/A

4556 CT = Central Tendency; HE = High-End

4557

4558 **2.4.1.30 Key Assumptions and Uncertainties of the Occupational Exposure**  
4559 **Assessment**

---

4560 EPA addressed variability in models by identifying key model parameters to apply a statistical  
4561 distribution that mathematically defines the parameter's variability. EPA defined statistical  
4562 distributions for parameters using documented statistical variations where available. Where the  
4563 statistical variation is not known, assumptions are made to estimate the parameter distribution  
4564 using available literature data. See the *Draft Risk Evaluation for Perchloroethylene Supplemental*  
4565 *Information: Assessment of Occupational Exposure and Environmental Releases for*  
4566 *Perchloroethylene* ([U.S. EPA 2019a](#)) for statistical distribution for each model input parameter.  
4567 The following sections discuss uncertainties in the occupational exposure assessment.

4568  
4569 **Number of Workers**

4570 There are a number of uncertainties surrounding the estimated number of workers potentially  
4571 exposed to PCE, as outlined below. Most are unlikely to result in a systematic underestimate or  
4572 overestimate but could result in an inaccurate estimate.

4573  
4574 CDR data are used to estimate the number of workers associated with manufacturing. There are  
4575 inherent limitations to the use of CDR data as they are reported by manufacturers and importers  
4576 of PCE. Manufacturers and importers are only required to report if they manufactured or  
4577 imported PCE in excess of 25,000 pounds at a single site during any calendar from 2012 to 2015;  
4578 as such, CDR may not capture all sites and workers associated with any given chemical. Second,  
4579 the estimate is based on information that is known or reasonably ascertainable to the submitter.  
4580 CDR submitters (chemical manufacturers and importers) do not always have accurate  
4581 information on the number of potentially exposed workers at downstream processing sites.

4582  
4583 There are also uncertainties with BLS data, which are used to estimate the number of workers for  
4584 the remaining conditions of use. First, BLS' OES employment data for each industry/occupation  
4585 combination are only available at the 3-, 4-, or 5-digit NAICS level, rather than the full 6-digit  
4586 NAICS level. This lack of granularity could result in an overestimate of the number of exposed  
4587 workers if some 6-digit NAICS are included in the less granular BLS estimates but are not, in  
4588 reality, likely to use PCE for the assessed conditions of use. EPA addressed this issue by refining  
4589 the OES estimates using total employment data from the U.S. Census' SUSB. However, this  
4590 approach assumes that the distribution of occupation types (SOC codes) in each 6-digit NAICS is  
4591 equal to the distribution of occupation types at the parent 5-digit NAICS level. If the distribution  
4592 of workers in occupations with PCE exposure differs from the overall distribution of workers in  
4593 each NAICS, then this approach will result in inaccuracy.

4594  
4595 Second, EPA's judgments about which industries (represented by NAICS codes) and  
4596 occupations (represented by SOC codes) are associated with the uses assessed in this report are  
4597 based on EPA's understanding of how PCE is used in each industry. Designations of which  
4598 industries and occupations have potential exposures is nevertheless subjective, and some  
4599 industries/occupations with few exposures might erroneously be included, or some  
4600 industries/occupations with exposures might erroneously be excluded. This would result in  
4601 inaccuracy but would be unlikely to systematically either overestimate or underestimate the  
4602 count of exposed workers.

4603

4604 **Analysis of Exposure Monitoring Data**

4605 To analyze the exposure data, EPA categorized individual PBZ data points as either “worker” or  
4606 “occupational non-user”. The categorizations are based on descriptions of worker job activity as  
4607 provided in literature and EPA’s judgment. In general, samples for employees that are expected  
4608 to have the highest exposure from direct handling of PCE are categorized as “worker” and  
4609 samples for employees that are expected to have lower exposure and do not directly handle PCE  
4610 are categorized as “occupational non-user”.

4611  
4612 Exposures for occupational non-users can vary substantially. Most data sources do not  
4613 sufficiently describe the proximity of these employees to the PCE exposure source. As such,  
4614 exposure levels for the “occupational non-user” category will have high variability depending on  
4615 the specific work activity performed. It is possible that some employees categorized as  
4616 “occupational non-user” have exposures similar to those in the “worker” category depending on  
4617 their specific work activity pattern.

4618  
4619 Some data sources may have a bias. For example, bias may be present if exposure monitoring  
4620 was conducted to address concerns regarding adverse human health effects reported following  
4621 exposures during use. Similarly, OSHA Chemical Exposure Health Data (CEHD) are obtained  
4622 from OSHA inspections, which may be the result of worker complaints, and may provide  
4623 exposure results that are generally more conservative than the industry average.

4624  
4625 Some scenarios have limited exposure monitoring data in literature, if any. Where few data are  
4626 available, the assessed exposure levels are unlikely to be representative of worker exposure  
4627 across the entire job category or industry. In addition, exposure data for compliance safety and  
4628 health officers may not be representative of typical exposure levels for occupational non-users.

4629  
4630 In cases where there was no exposure monitoring data, EPA attempted to identify monitoring  
4631 data from similar conditions of use as surrogate. While these conditions of use have similar  
4632 worker activities contributing to exposures, it is unknown if the results will be fully  
4633 representative of worker exposure across different conditions of use.

4634  
4635 Where the sample data set contains six or more data points, the 50<sup>th</sup> and 95<sup>th</sup> percentile exposure  
4636 concentrations were calculated from the sample to represent central tendency and high-end  
4637 exposure levels. using available data. The underlying distribution of the data, and the  
4638 representativeness of the available data, are not known. Where discrete data was not available,  
4639 EPA used reported statistics (i.e., median, mean, 90<sup>th</sup> percentile, etc.). Since EPA could not  
4640 verify these values, there is an added level of uncertainty.

4641  
4642 **Near-Field/Far-Field Model Framework**

4643 The near-field/far-field approach is used as a framework to model inhalation exposure for many  
4644 conditions of use. The following describe uncertainties and simplifying assumptions generally  
4645 associated with this modeling approach:

- 4646
- 4647 • There is some degree of uncertainty associated with each model input parameter. In  
4648 general, the model inputs were determined based on review of available literature. Where  
4649 the distribution of the input parameter is known, a distribution is assigned to capture

- 4650 uncertainty in the Monte Carlo analysis. Where the distribution is unknown, a uniform  
4651 distribution is often used. The use of a uniform distribution will capture the low-end and  
4652 high-end values but may not accurately reflect actual distribution of the input parameters.
- 4653 • The model assumes the near-field and far-field are well mixed, such that each zone can  
4654 be approximated by a single, average concentration.
  - 4655 • All emissions from the facility are assumed to enter the near-field zone. This assumption  
4656 will overestimate exposures and risks in facilities where some emissions do not enter the  
4657 airspaces relevant to worker exposure modeling.
  - 4658 • The exposure models estimate airborne concentrations. Exposures are calculated by  
4659 assuming workers spend the entire activity duration in their respective exposure zones  
4660 (i.e., the worker in the near-field and the occupational non-user in the far-field). Since  
4661 vapor degreasing and cold cleaning involve automated processes, a worker may actually  
4662 walk away from the near-field during part of the process and return when it is time to  
4663 unload the degreaser. As such, assuming the worker is exposed at the near-field  
4664 concentration for the entire activity duration may overestimate exposure.
  - 4665 • For certain PCE applications (e.g. vapor degreasing and cold cleaning), PCE vapor is  
4666 assumed to emit continuously while the equipment operates (i.e. constant vapor  
4667 generation rate). Actual vapor generation rate may vary with time. However, small time  
4668 variability in vapor generation is unlikely to have a large impact in the exposure estimates  
4669 as exposures are calculated as a time-weighted average.
  - 4670 • The exposure models represent model workplace settings for each PCE condition of use.  
4671 The models have not been regressed or fitted with monitoring data.

4672  
4673 Each subsequent section below discusses uncertainties associated with the individual model.

4674  
4675 **Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model**

4676 For the other industrial uses and waste handling, disposal, treatment, and recycling conditions of  
4677 use, the *Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure*  
4678 *Model* is used to estimate the airborne concentration associated with generic chemical loading  
4679 scenarios at industrial facilities. Specific uncertainties associated with this model are described  
4680 below:

- 4681
- 4682 • After each loading event, the model assumes saturated air containing PCE that remains in  
4683 the transfer hose and/or loading arm is released to air. The model calculates the quantity  
4684 of saturated air using design dimensions of loading systems published in the OPW  
4685 Engineered Systems catalog and engineering judgment. These dimensions may not be  
4686 representative of the whole range of loading equipment used at industrial facilities  
4687 handling PCE.
  - 4688 • The model estimates fugitive emissions from equipment leaks using total organic  
4689 compound emission factors from EPA's *Protocol for Equipment Leak Emission*  
4690 *Estimates* ([U.S. EPA 1995](#)), and engineering judgement on the likely equipment type  
4691 used for transfer (e.g. number of valves, seals, lines, and connections). The applicability  
4692 of these emission factors to PCE, and the accuracy of EPA's assumption on equipment  
4693 type are not known.
  - 4694 • The model assumes the use of a vapor balance system to minimize fugitive emissions.  
4695 Although most industrial facilities are likely to use a vapor balance system when

4696 loading/unloading volatile chemicals, EPA does not know whether these systems are used  
4697 by all facilities that potentially handle PCE.  
4698

### 4699 **Vapor Degreasing and Cold Cleaning Models**

4700 The conveyORIZED vapor degreasing, web degreasing, and cold cleaning assessments use a near-  
4701 field/far-field approach to model worker exposure. In addition to the uncertainties described  
4702 above, the vapor degreasing and cold cleaning models have the following uncertainties:  
4703

- 4704 • To estimate vapor generation rate for each equipment type, EPA used a distribution of the  
4705 emission rates reported in the 2014 NEI for each degreasing/cold cleaning equipment  
4706 type. NEI only contains information on major sources not area sources. Therefore, the  
4707 emission rate distribution used in modeling may not be representative of degreasing/cold  
4708 cleaning equipment emission rates at area sources.
- 4709 • The emission rate for conveyORIZED vapor degreasing is based on equipment at a single  
4710 site and the emission rates for web degreasing are based on equipment from two sites. It  
4711 is uncertain how representative these data are of a “typical” site.
- 4712 • EPA assumes workers and occupational non-users remove themselves from the  
4713 contaminated near- and far-field zones at the conclusion of the task, such that they are no  
4714 longer exposed to any residual PCE in air.

### 4715 **Brake Servicing Model**

4716 The aerosol degreasing assessment also uses a near-field/far-field approach to model worker  
4717 exposure. Specific uncertainties associated with the aerosol degreasing scenario are presented  
4718 below:  
4719

- 4720 • The model references a CARB study ([CARB 2000](#)) on brake servicing to estimate use  
4721 rate and application frequency of the degreasing product. The brake servicing scenario  
4722 may not be representative of the use rates for other aerosol applications involving PCE.
- 4723 • The CARB study ([CARB 2000](#)) presented 13 different aerosol degreasing formulations  
4724 containing PCE. For each Monte Carlo iteration, the model determines the PCE  
4725 concentration in product by selecting one of 13 possible formulations, assuming the  
4726 distribution for each formulation is equal to that found in a survey of brake cleaning  
4727 shops in California. It is uncertain if this distribution is representative of other geographic  
4728 locations within the U.S.
- 4729 • Some of the aerosol formulations presented in the CARB study ([CARB 2000](#)) were  
4730 provided as ranges. For each Monte Carlo iteration the model selects a PCE concentration  
4731 within the range of concentrations using a uniform distribution. In reality, the PCE  
4732 concentration in the formulation may be more consistent than the range provided.

### 4733 **Dry Cleaning Model**

4734 The multi-zone dry cleaning model also uses a near-field/far-field approach. Specific  
4735 uncertainties associated with the dry cleaning scenario are presented below (see also Section  
4736 2.4.1.16):  
4737

- 4738 • The model assumes each facility only has one dry cleaning machine, cleaning one to  
4739 fourteen loads of garments per day. The number of machines is based on the 2010 King  
4740  
4741

4742 County, WA survey ([Whittaker and Johanson 2011](#)) where 96 percent of 151 respondents  
4743 reported having only one machine at their facility. It is uncertain if this distribution is  
4744 representative of other geographic locations in the U.S. Larger facilities are likely to have  
4745 more machines, which could result in additional PCE exposures.

- 4746 • The model conservatively uses a hemispherical volume based on the dry cleaning  
4747 machine door diameter as the near-field for machine unloading. The small near-field  
4748 volume results in a large spike in concentration when the machine door is opened, where  
4749 any residual PCE solvent is assumed to be instantaneously released into the near-field. In  
4750 reality, the residual solvent will likely be released continuously over a period of time. In  
4751 addition, the worker may move around while unloading the garments, such that the  
4752 worker's breathing zone will not always be next to the machine door throughout the  
4753 duration of this activity. Therefore, these assumptions may result in an overestimate of  
4754 worker exposure during machine unloading.
- 4755 • Many of the model input parameters were obtained from von Grote ([2003](#)), which is a  
4756 German study. Aspects of the U.S. dry cleaning facilities may differ from German  
4757 facilities. However, it is not known whether the use of German data will under- or over-  
4758 estimate exposure.
- 4759 • The model does not cover all potential worker activities at dry cleaners. For example,  
4760 workers could be exposed to PCE emitted due to equipment leaks, when re-filling PCE  
4761 solvent into dry cleaning machines, when interrupting a dry cleaning cycle, or when  
4762 performing maintenance activities (e.g., cleaning lint and button traps, raking out the still,  
4763 changing solvent filter, and handling solvent waste) ([OSHA 2005](#)). However, there is a  
4764 lack of information on these activities in the literature, and the frequency of these  
4765 activities is not well understood. The likelihood of equipment leaks is dependent on  
4766 whether the machines are properly maintained. The frequency of solvent re-filling  
4767 depends on a specific dry cleaner's workload and solvent consumption rate, which is also  
4768 affected by the presence of leaks. Based on observations reported by NIOSH ([2010](#)) and  
4769 Blando ([2010](#)), solvent charging is not performed every day. EPA was unable to develop  
4770 a modeling approach for these exposure activities due to the lack of available  
4771 information.

4772  
4773 ***Modeled Dermal Exposures***

4774 The *Dermal Exposure to Volatile Liquids Model* used to estimate dermal exposure to PCE in  
4775 occupational settings. The model assumes a fixed fractional absorption of the applied dose;  
4776 however, fractional absorption may be dependent on skin loading conditions. The model also  
4777 assumes a single exposure event per day based on existing framework of the *EPA/OPPT 2-Hand*  
4778 *Dermal Exposure to Liquids Model* and does not address variability in exposure duration and  
4779 frequency.

4780

4781 **2.4.2 Consumer Exposures**

4782 EPA evaluated PCE exposure resulting from the use of relevant consumer products and  
4783 consumer articles. EPA gathered and evaluated consumer exposure information according to the  
4784 process described in the *Application of Systematic Review in TSCA Risk Evaluations* ([U.S. EPA](#)  
4785 [2018b](#)). PCE concentrations measured in residential air or personal breathing zone samples are  
4786 reported in Section 2.4.2.1. Monitoring and/or controlled laboratory data were available for a

4787 limited number of consumer use scenarios. To fill data gaps, EPA utilized a modeling approach  
4788 to estimate PCE exposure via use of consumer products and articles (Section 2.4.2.3 and Section  
4789 2.4.2.4, respectively).

#### 4790 **2.4.2.1 Overview and Literature Summary**

4791 Concentrations of volatile organic compounds, such as PCE, are often higher in indoor air than  
4792 outdoor air due to their presence in consumer products and articles ([Lehmann et al. 2002](#);  
4793 [Fishbein 1992](#); [Thomas et al. 1991](#)). In developed countries, people generally spend 90% of their  
4794 time indoors ([de Blas et al. 2012](#); [Fishbein 1992](#)), and indoor air quality can be greatly  
4795 compromised due to volatile emissions from cleaning agents, dry cleaned clothes, adhesives,  
4796 paints and other commercial and consumer products ([Canada 2017](#); [de Blas et al. 2012](#); [D'Souza  
4797 et al. 2009](#); [Lehmann et al. 2002](#); [Thomas et al. 1991](#)).

4798  
4799 Systematic review was conducted to identify consumer specific exposure data for PCE  
4800 containing products and articles (data evaluation tables are available in the Draft Risk Evaluation  
4801 for PCE Systematic Review Supplemental File Data Quality Evaluation of Consumer Exposure  
4802 Studies). The literature review returned limited information about chemical-specific consumer  
4803 monitoring. Most results from the systematic review pertained to indoor air and personal  
4804 breathing zone concentrations of PCE in residential and consumer settings. Monitoring sites  
4805 included the United States, Canada, Mexico, Sweden, Finland, Estonia, Lithuania, Belgium,  
4806 United Kingdom, France, Austria, Germany, Poland, Slovakia, Czech Republic, Hungary,  
4807 Romania, Bulgaria, Serbia, Bosnia and Herzegovina, Italy, Portugal, Malta, Greece, Cyprus,  
4808 Albania, Netherlands, China, Japan, Saudi Arabia and Hong Kong.

4809  
4810 EPA identified 19 acceptable studies from the United States and Canada deemed to be in the  
4811 scope of this risk assessment, which monitored residential or commercial indoor air for PCE  
4812 concentrations, for a total of 3172 measured samples. Identified studies were conducted between  
4813 the years 1980 and 2013. The detection frequency of PCE in the identified studies ranged from  
4814 30% to 100% detection, with a median of 95% detection (with 4 studies not reporting detection  
4815 frequency). Measured PCE concentrations in indoor air ranged from non-detects (detection limits  
4816 varied) 94985 ug/m<sup>3</sup>, with reported central tendency (mean) values ranging from 0.2 ug/m<sup>3</sup> to  
4817 58348 ug/m<sup>3</sup>. The maximum air concentration of PCE was measured in a do-it-yourself laundry  
4818 facility with coin-operated dry cleaning machines ([Howie 1981](#)). Full data extraction details for  
4819 residential indoor air samples conducted in schools and commercial establishments in the US and  
4820 Canada is provided in the Draft Risk Evaluation for PCE Data Extraction for Consumer and  
4821 Aquatic Exposure Monitoring Studies.

4822  
4823  
4824 Of the identified studies, 11 pertained to air concentrations of PCE limited to residential homes  
4825 in the United States and Canada (Table 2-61). Residential indoor air monitoring studies were  
4826 conducted between 1986 and 2010, with roughly 1,900 samples collected across eleven US states  
4827 (CA, CO, IL, IN, MA, MI, MN, NJ, NY, OH, and TX) and Canada (exact location not reported).  
4828 Concentrations ranged from non-detect (limits varied) to 171 µg/m<sup>3</sup>. The highest concentration  
4829 was from the Canadian study ([Chan et al. 1990](#)), which sampled air concentration in Canadian  
4830 residences. The next highest concentration was 78 µg/m<sup>3</sup>, collected from inner-city homes in  
4831 New York, New York ([Sax et al. 2004](#)). Maximum concentrations of approximately 30 µg/m<sup>3</sup>  
4832 were detected in garages in Boston, Massachusetts ([Dodson et al. 2008](#)) and in living areas of



4833 industrial, urban, and suburban homes in Michigan ([Jia et al. 2008a](#)). All other maximum  
4834 reported concentrations were less than  $14 \mu\text{g}/\text{m}^3$ . Measures of central tendency (average or  
4835 median) across all datasets were less than  $7 \mu\text{g}/\text{m}^3$ , except for the Canadian study at  $28.1 \mu\text{g}/\text{m}^3$ .

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**Table 2-62.** Residential Indoor Air Concentrations ( $\mu\text{g}/\text{m}^3$ ) of PCE in the United States and Canada

Study Info	Site Description	Detection Limit	Min.	Mean	GM	Median	Max.	Variance	Data Quality Rating
( <a href="#">Chin et al. 2014</a> ); US, 2009-2010 (n = 126; DF = 0.91)	Detroit, MI area; Homes (n=126) with asthmatic children, sampled in living rooms and bedroom	0.091	ND	0.71	--	0.26	13.7	1.66 (SD)	High
( <a href="#">Batterman et al. 2007</a> ); US, 2005 (n = 15; DF = 0.73)	Southeast MI; Homes (n = 15) sampled in various locations in the home (upstairs, downstairs)	0.069	--	0.6	--	--	4.4	1.2 (SD)	High
( <a href="#">Batterman et al. 2007</a> ); US, 2005 (n = 15; DF = 0.33)	Southeast MI; Garages of residences (n = 15)	0.069	--	0.3	--	--	1.6	0.5 (SD)	High
( <a href="#">Jia et al. 2008a</a> ); US, 2004-2005 (n = 252; DF = 0.99)	Ann Arbor, Ypsilanti, and Dearborn MI; Homes (n=159) in industrial, urban, and suburban cities over two seasons	0.02	ND	0.93	--	0.39	27.84	--	Medium
( <a href="#">Dodson et al. 2008</a> ) <sup>a</sup> ; US, 2004-2005 (n = 16; DF = 0.81)	Boston, MA; Garage of residences	0.07-0.17	ND	2.8	--	0.3	31 (95th)	7.8 (SD)	High
( <a href="#">Dodson et al. 2008</a> ) <sup>a</sup> ; US, 2004-2005 (n = 10; DF = 0.9)	Boston, MA; Apartment hallway of residences	0.07-0.17	ND	1.9	--	0.8	11 (95th)	3.4 (SD)	High
( <a href="#">Dodson et al. 2008</a> ) <sup>a</sup> ; US, 2004-2005 (n = 52; DF = 0.98)	Boston, MA; Basement of residences	0.07-0.17	ND	1.7	--	0.5	1.7 (95th)	0.92 (SD)	High
( <a href="#">Dodson et al. 2008</a> ) <sup>a</sup> ; US, 2004-2005 (n = 83; DF = 0.92)	Boston, MA; Interior room of residences	0.07-0.17	ND	1.9	--	0.6	8.6 (95th)	3.1 (SD)	High
( <a href="#">Adgate et al. 2004</a> ); US, 2000 (n = 113; DF = 0.949)	Minneapolis, MN in spring; Sampling from room where child spent the most time.	--	ND (10 <sup>th</sup> 0.02)	--	--	0.4	1 (90th)	--	Medium
( <a href="#">Adgate et al. 2004</a> ); US, 2000 (n=113; DF = 0.98)	Minneapolis, MN in winter; Sampling from room where child spent the most time.	--	ND (10 <sup>th</sup> 0.02)	--	--	0.5	1.3 (90th)	--	Medium
( <a href="#">Sax et al. 2004</a> ); US, 2000 (n = 32; DF = 1)	Los Angeles, CA in fall; Homes in inner-city neighborhood	0.15	0.6	1.8	--	1.3	6.8	1.4 (SD)	High

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Study Info	Site Description	Detection Limit	Min.	Mean	GM	Median	Max.	Variance	Data Quality Rating
( <a href="#">Sax et al. 2004</a> ); US, 2000 (n = 40; DF = 1)	Los Angeles, CA in winter; Homes in inner-city neighborhood	0.15	0.7	2.3	--	1.9	11	1.9 (SD)	High
( <a href="#">Sax et al. 2004</a> ); US, 1999 (n = 30; DF = 0.78)	New York, NY in summer; Homes in inner-city neighborhood.	0.15	ND	5.3	--	2	43	8.7 (SD)	High
( <a href="#">Sax et al. 2004</a> ); US, 1999 (n = 36; DF = 1)	New York, NY in winter; Homes in inner-city neighborhood.	0.15	0.8	6.7	--	3.5	78	13.1 (SD)	High
( <a href="#">Clayton et al. 1999</a> ); US, 1995-1997 (n = 402; DF = 0.571)	IL, IN, OH, MI, MN, WI (Great Lakes Region); Non- institutionalized persons	--	ND	5.82	--	1.89	6.83 (90th)	--	High
( <a href="#">Su et al. 2013</a> ) <sup>b</sup> ; US, 1999-2001 (n = 539; DF = NR)	Elizabeth, NJ; Houston, TX; and Los Angeles, CA; Non-smoking households (n=310)	0.21	--	1.85	--	0.82	6.03 (95th)	4.53 (SD)	Medium
( <a href="#">Van Winkle and Scheff 2001</a> ); US, 1994-1995 (n = 48; DF = 1)	Southeast Chicago, IL; Urban homes (n=10) sampled over a 10- month period from the kitchen in the breathing zone.	--	0.54	2.61	--	2.17	4.74 (90th)	2.15 (SD)	High
( <a href="#">Lindstrom et al. 1995</a> ); US, 1994 (n = 9; DF = 0.89)	Denver, CO; Homes, occupied (n=9)	0.14	ND	0.66	--	0.33	1.99	--	Medium
( <a href="#">Chan et al. 1990</a> ); CA, 1987 (n = 6; DF = 1)	Homes (n=6), main floor	--	2	6.2	--	--	18	--	Medium
( <a href="#">Chan et al. 1990</a> ); CA, 1986 (n = 12; DF = 1)	Homes (n=12), main floor	--	1	28.1	--	--	171	--	Medium

4838 Study Info: The information provided includes the HERO ID and citation; country and year samples collected; number of samples and detection frequency.  
4839 Abbreviations: If a value was not reported, it is shown in this table as "--". ND = not detected at the reported detection limit. GM = geometric mean. DF =  
4840 detection frequency. NR = Not reported. US = United States. CA = Canada  
4841 Parameters: All statistics are shown as reported in the study. Some reported statistics may be less than the detection limit; the method of handling non-detects  
4842 varied by study. All minimum values determined to be less than the detection limit are shown in this table as "ND". If a maximum value was not provided, the  
4843 highest percentile available is shown (as indicated in parentheses); if a minimum value was not provided, the lowest percentile available is shown (as indicated in  
4844 parentheses).  
4845 <sup>a</sup> Samples from this study ([Dodson et al. 2008](#)) were collected as part of the BEAMS study.  
4846 <sup>b</sup> Samples from this study ([Su et al. 2013](#)) were collected as part of the RIOPA study.

4847 EPA identified 20 acceptable studies conducted outside of North America (Mexico, and the  
4848 previously listed countries in Europe, Asia and the Middle East), for a total of 4369 measured  
4849 samples. Identified studies were conducted between the years 1981 and 2015. The detection  
4850 frequency of PCE in the identified foreign studies ranged from 30% to 100% detection, with a  
4851 median of 100% detection (with 12 studies not reporting detection frequency). Measured PCE  
4852 concentrations in indoor air ranged from non-detects (detection limits varied) to  $9.63 \times 10^4$   $\mu\text{g}/\text{m}^3$ ,  
4853 with reported central tendency (mean) values ranging from  $0.46 \mu\text{g}/\text{m}^3$  to  $4.95 \times 10^3 \mu\text{g}/\text{m}^3$ . The  
4854 maximum air concentration of  $9.63 \times 10^4 \mu\text{g}/\text{m}^3$  was measured near a photocopy shop ([Kiurski et al. 2016](#)).  
4855 The next highest reported concentration was  $2.48 \times 10^4 \mu\text{g}/\text{m}^3$  in a vehicle exposed to  
4856 dry cleaned articles ([Gulyas and Hemmerling 1990](#)). The highest PCE concentration measured in  
4857 residential air was  $245 \mu\text{g}/\text{m}^3$  measured in urban homes in Paris, France ([Roda et al. 2013](#)). Full  
4858 data extraction details for indoor residential air samples, from studies conducted within and  
4859 outside of North America, is provided in the Draft Risk Evaluation for PCE Data Extraction for  
4860 Consumer and Aquatic Exposure Monitoring Studies.

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### 4862 **Personal Breathing Zone**

4863 Concentrations of PCE in personal breathing zone measurements are reported in Table 2-62 for  
4864 seven US studies. Overall, the measured concentration dataset contains approximately 3,000  
4865 samples that were collected between 1981 and 2001, and represents time spent in various  
4866 microenvironments (i.e., home, school, work, transit) during the monitoring period (48- to 72-hr  
4867 periods in four studies, and 3-hr, 12-hr, and/or 6-day periods for the remainder). Only the 3-hr  
4868 samples from Heavner ([1995](#)) represent time inside the home only. Concentrations ranged from  
4869 non-detects (detections limits varied) to  $659 \mu\text{g}/\text{m}^3$ . The highest concentration was observed in  
4870 NHANES survey data from 1999-2000 ([Jia et al. 2008a](#)). The study notes that two participants  
4871 had exposure to highly elevated levels of PCE; one participant spent more time than usual at  
4872 work/school and the other participant worked with paint thinners, brush cleaners, or strippers as  
4873 well as glues, adhesives, hobbies or crafts, and also reported having new carpet installed in the  
4874 past 6 months. The 95th percentile concentration for the NHANES study was  $18.5 \mu\text{g}/\text{m}^3$ .  
4875 Maximum reported concentrations in other studies were less than  $11 \mu\text{g}/\text{m}^3$  (including the 90<sup>th</sup> or  
4876 95<sup>th</sup> percentile if a maximum was not provided). Median values ranged from  $0.4$  to  $2 \mu\text{g}/\text{m}^3$ ;  
4877 whereas, average values were higher, reaching a maximum of approximately  $30 \mu\text{g}/\text{m}^3$  ([Sexton  
4878 et al. 2007](#); [Clayton et al. 1999](#)). Full data extraction details for personal breathing zone samples,  
4879 from studies conducted within and outside of North America, is provided in the Draft Risk  
4880 Evaluation for PCE Data Extraction for Consumer and Aquatic Exposure Monitoring Studies.

4881 **Table 2-63.** Personal Breathing Zone Air Concentrations ( $\mu\text{g}/\text{m}^3$ ) for PCE in the United States (General/Residential)

Study Info	Type	Site/Population Description	Detection Limit	Min.	Mean	GM	Median	Max.	Variance	Data Eval. Score
( <a href="#">Su et al. 2013</a> ) <sup>a</sup> US, 1999-2001 (n=544; DF = NR)	48-hr	Elizabeth, NJ; Houston, TX; and Los Angeles, CA; Adults (n=309) and children (n=118) from 310 non-smoking households.	0.21	--	7.17	--	0.89	6.82 (95 <sup>th</sup> )	112.35 (SD)	Medium
( <a href="#">Jia et al. 2008b</a> ) <sup>b</sup> US, 1999-2000 (n=665; DF = 0.69)	48- to 72-hr	Nation-wide; Adults (ages 20–59 years) in NHANES study	0.42	ND (0.1)	5.2	1.0	0.7	659.1 (18.5 - 95 <sup>th</sup> )	31.2 (SD); 4.1 (GSD)	Medium
( <a href="#">Adgate et al. 2004</a> ) US, 2000 (n=113; DF = 1)	48-hr	Minneapolis, MN in winter; children ages 6-10 yrs	--	0.2 (10 <sup>th</sup> )	--	--	0.4	1.3 (90 <sup>th</sup> )	--	Medium
( <a href="#">Adgate et al. 2004</a> ) US, 2000 (n=113; DF = 0.966)	48-hr	Minneapolis, MN in spring; children ages 6-10 yrs	--	ND (0.2 10 <sup>th</sup> )	--	--	0.4	0.9 (90 <sup>th</sup> )	--	Medium
( <a href="#">Sexton et al. 2007</a> ) US, 1999 (n=333; DF = 0.997)	48-hr	Minneapolis -St. Paul, MN; Adults, non-smoking (n=70) living in three neighborhoods: (inner-city, blue-collar/near manufacturing plants, and affluent)	--	ND (0.3 10 <sup>th</sup> )	27.8	--	0.9	6.4 (90 <sup>th</sup> )	--	High
( <a href="#">Clayton et al. 1999</a> ) <sup>c</sup> US, 1995-1997 (n=386; DF = 0.613)	6-day	IL, IN, OH, MI, MN, WI (Great Lakes Region); Non-institutionalized persons	--	ND	31.92	--	1.98	10.78 (90 <sup>th</sup> )	--	High
( <a href="#">Heavner et al. 1995</a> ) <sup>d</sup> US, 1991 (n=25; DF = NR)	3-hrs (in home only)	Columbus, OH; Non-smoking (n=25) women with smoking husbands	--	ND	0.89	--	0.68	3.78	0.96 (SD)	Medium
( <a href="#">Heavner et al. 1995</a> ) <sup>d</sup> US, 1991 (n=24; DF = NR)	3-hrs (in home only)	Columbus, OH; Non-smoking women (n=24) with non-smoking husbands	--	ND	1.24	--	0.7	5.13	1.46 (SD)	Medium
( <a href="#">Wallace 1987</a> ) <sup>e</sup> US, 1981-1984 (n=772; DF = 0-0.97)	12-hrs	Elizabeth and Bayonne, NJ, Los Angeles, CA, and Contra Costa, CA; Adults s in industrial/chemical manufacturing and /or petroleum refining regions of the US.	--	--	5.6 to 45	--	--	--	--	High

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4883 Abbreviations: If a value was not reported, it is shown in this table as "--". ND = not detected at the reported detection limit. GM = geometric mean. GSD =  
4884 geometric standard deviation. DF = detection frequency. NR = Not reported. US = United States.  
4885 Parameters: All statistics are shown as reported in the study. Some reported statistics may be less than the detection limit; the method of handling non-detects  
4886 varied by study. All minimum values determined to be less than the detection limit are shown in this table as "ND". If a maximum value was not provided, the  
4887 highest percentile available is shown (as indicated in parentheses); if a minimum value was not provided, the lowest percentile available is shown (as indicated in  
4888 parentheses).  
4889 <sup>a</sup> Samples from this study ([Su et al. 2013](#)) were collected as part of the RIOPA study. The study notes that PCE exposures increased by visiting a drycleaner.  
4890 <sup>b</sup> Samples from this study ([Jia et al. 2008b](#)) were collected as part of the NHANES 1999-2000. Two measurements with high values (659 and 490  $\mu\text{g}/\text{m}^3$ ) were  
4891 more than five times higher than the next measurement. These two participants did not report dry cleaning exposure, breathing fumes from or using dry cleaning  
4892 fluid or spot remover. One participant spent an unusually large amount of time at work/school and another subject worked with paint thinners, brush cleaners, or  
4893 strippers as well as glues, adhesives, hobbies or crafts, and also reported having new carpet installed in the past 6 months.  
4894 <sup>c</sup> Samples from this study ([Clayton et al. 1999](#)) were collected as part of the NHEXAS Phase 1 field study.  
4895 <sup>d</sup> In Heavner ([1995](#)), elevated concentrations of PCE were associated with wearing dry cleaned clothes ( $p \leq 0.05$ ) when all homes were combined, but not for  
4896 smoking and non-smoking separately. Statistical power was low since only 2 of 49 participants wore dry cleaned clothes within the previous week.  
4897 <sup>e</sup> Samples from this study ([Wallace 1987](#)) were collected as part of the TEAMS study.

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### **2.4.2.2 Consumer Exposure Approach and Methodology**

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Consumer exposures to PCE are expected via inhalation and dermal routes based on physical-chemical properties and identified consumer uses. PCE can be found in consumer and/or commercial products that are readily available for public purchase at common retailers (([U.S. EPA 2017f](#)), Sections 3, 4 and 5) and can therefore result in exposures to consumers and bystanders (non-product users that are incidentally exposed to the product). The magnitude of exposure depends upon the concentration of PCE products, use patterns (including frequency, duration, amount of product used, room of use) and application methods. Several consumer product use scenarios were analyzed based on identified PCE products and articles available to consumers, including solvents for cleaning and degreasing, lubricants and greases, adhesives and sealant chemicals, paints and coatings, mold release products, metal and stone polishes, and exposure to recently dry cleaned articles. Consumer exposure to elevated indoor air concentrations of PCE due to the use of coin-operated dry cleaning machines and retail print-shops was summarized based on available literature.

Consumer product application activities include using aerosol and liquid products for spraying, wiping, immersive cleaning and painting. Other activities include pouring and applying various types of liquids and pastes. Information regarding use patterns and application methods was obtained from national solvent usage surveys ([Westat 1987](#)), as well as EPA's Consumer Exposure Model (CEM) Version 2.1 (see CEM 2.1 User Guide ([U.S. EPA 2019b](#))). PCE weight fractions and product densities of PCE containing products were compiled from publicly available product MSDS or SDS documents (Material Safety Data Sheet or Safety Data Sheet, see EPAs Preliminary Information on Manufacturing, Processing, Distribution, use and Disposal: Tetrachloroethylene ([2017f](#))). If product densities were not reported, the product density was estimated based on reported mass percent composition of the product relative to constituent densities. Other physical-chemical parameters for PCE are referenced in the Scoping and Problem Formulation documents.

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#### **2.4.2.2.1 Routes of Exposure**

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##### **Inhalation**

Consumer and bystander inhalation exposure to PCE-containing products primarily include direct inhalation of vapors, mists and aerosols (e.g., aerosols from spray applications) and indirect inhalation exposures after application. EPA assumed mists are absorbed via inhalation, rather than ingestion, due to deposition of vapors and mists in the upper respiratory tract. The magnitude of inhalation exposure depends upon the concentration of PCE in products, use patterns (including frequency, duration, amount of product used, room of use) and application methods. Several product types and scenarios were analyzed for inhalation exposure including spray adhesives, spray lubricants, spray paints and primers, spray degreasers (brake and engine cleaning, parts cleaning and electronics cleaning), spray protectants and stain removers. Consumer inhalation exposure to PCE emitted from recently dry cleaned articles was also evaluated. Given the high vapor pressure of PCE, products used in the liquid form are also likely to result in inhalation exposure to consumers and bystanders. PCE containing liquid product use categories include parts cleaners and degreasers, stone and marble polishes, adhesives and sealants, ceramic overglaze, and paint primers.

4942 **Dermal**

4943 Consumer dermal exposure to PCE-containing products occurs via vapor or mist deposition onto  
4944 the skin, or via direct contact with liquids during product use, and direct contact with treated  
4945 articles ([U.S. EPA 2012d](#)). PCE is absorbed dermally, and exposure magnitude depends on  
4946 exposure characteristics such as skin surface area, product volume, chemical loading and weight  
4947 fraction, and exposure duration. PCE is a volatile solvent, expected to evaporate from skin  
4948 quickly. However, there are certain consumer use scenarios for which product evaporation may  
4949 be limited, for example due to immersion of hands into a reservoir of cleaning solvent  
4950 (reasonable given that consumers are not assumed to use PPE, as well as the nature of PCE  
4951 containing products and uses), the wearing of recently dry cleaned fabrics, or handling/wiping  
4952 using a solvent soaked rag. Consumer uses analyzed for dermal exposure with impeded  
4953 evaporation include immersive parts cleaning, aerosol degreasers, liquid stone and marble  
4954 polishes, liquid sealants, liquid paint primers and the wearing of recently dry cleaned articles.

4955 **Ingestion**

4956 Consumers may be exposed to PCE via transfer of chemical from hand to mouth. However, this  
4957 exposure pathway is expected to be limited by a combination of dermal absorption and high  
4958 volatilization of PCE. Due to the expected very low magnitude of accidental hand to mouth  
4959 exposure, EPA did not further assess this pathway.

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4961 **from Disposal**

4962 EPA does not expect exposure to consumers from disposal of consumer products. It is  
4963 anticipated that most products will be disposed of in original containers, particularly those  
4964 products that are purchased as aerosol cans.

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4966 **2.4.2.2.2 Modeling Approach**

4967 EPA estimated consumer exposures for all currently known use scenarios for products containing  
4968 PCE. A variety of sources were reviewed during the Systematic Review process to identify these  
4969 products and/or articles, including Safety Data Sheets (SDS), National Institutes of Health (NIH)  
4970 Household Products Database, the Chemical and Products (CPCat) Database, Peer-reviewed and  
4971 gray literature and the Kirk-Othmer Encyclopedia of Chemical Technology.

4972

4973 Consumer exposures were assessed for all PCE containing products identified as available for  
4974 consumer purchase, as described in EPA's Preliminary Information on Manufacturing,  
4975 Processing, Distribution, use and Disposal: Tetrachloroethylene ([2017f](#)). No chemical-specific  
4976 personal monitoring data was identified during Systematic Review, except in the case of  
4977 exposure to PCE from recently dry cleaned articles, and indoor air concentrations from coin-  
4978 operated laundry and printshop proximity. Due to the lack of consumer monitoring data, a  
4979 modeling approach was used to estimate potential consumer exposures. EPA's Consumer  
4980 Exposure Model ([U.S. EPA 2017a](#)) was selected as the most appropriate model for PCE  
4981 consumer product use scenarios, as described in below and in the Draft Risk Evaluation for PCE  
4982 Supplemental Information on Consumer Exposure. CEM was used to estimate indoor air  
4983 concentrations of PCE and dermal exposure to PCE in certain scenarios, generated from the use  
4984 of consumer products. Consumer exposure to recently dry cleaned fabrics was also estimated,  
4985 based on reasonably available monitoring data. Inhalation exposure due to off-gassing from  
4986 recently dry cleaned articles was assessed using EPA's Multi-Chamber Concentration and



4987 Exposure Model (MCCEM, ([U.S. EPA 2019e](#))), and dermal exposure due to wearing dry cleaned  
4988 articles was assessed using CEM, as described in the Draft Risk Evaluation for PCE  
4989 Supplemental Information on Consumer Exposure.

4990  
4991 EPA's Consumer Exposure Model was chosen based on model relevance to consumer use  
4992 scenarios, the in-model database of consumer relevant default parameters, and model flexibility  
4993 to modify parameters when chemical-specific information is available. CEM was also preferred  
4994 because it does not require chemical- and/or product-specific emission data, as is required to run  
4995 more complex indoor/consumer models. CEM is a deterministic model utilizing user provided  
4996 input parameters and/or assumptions to generate exposure estimates. A full discussion of CEM  
4997 features and general parameterization can be found in the *Draft Risk Evaluation for*  
4998 *Perchloroethylene Supplemental Information on Consumer Exposure* ([U.S. EPA 2020f](#)).

4999  
5000 Model parameters were determined based on physical chemical properties and product  
5001 information (e.g., product density, water solubility, vapor pressure, etc.), use-specific consumer  
5002 survey data (Westat ([1987](#)); e.g., duration of use, frequency of use, mass of product used per  
5003 event, etc.), and where applicable, model scenario defaults (e.g., room of use, activity patterns,  
5004 air exchange rates, environment volume). A negligible background concentration of PCE was  
5005 assumed for all scenarios. Room of use was selected based on either CEM scenario default room  
5006 of use or a Westat survey category room of use (often in agreement with one another), based on  
5007 professional judgement. The CEM model does not currently accommodate outdoor scenarios.  
5008 For products that are intended to be used outdoors, modifications to the CEM inputs were made  
5009 to simulate an outdoor scenario by adjusting Zone 1 parameters (which represents the room of  
5010 use or use environment). In modeling caulk and column adhesives, the garage was selected as the  
5011 room of use, but the room volume was changed to 16 m<sup>3</sup> to represent a half-dome chemical cloud  
5012 around the person using the product. Additionally, the air exchange rate for Zone 1 was set to  
5013 100 to reflect the high rate between the cloud and the rest of outside. The interzonal ventilation  
5014 rate was set to 0, which effectively blocks the exchange of air between Zone 1 and the rest of the  
5015 house. Thus, the concentrations users are exposed to inside the home after product use is zero. In  
5016 the outside scenario, bystanders in the home are assumed to have zero exposures. However,  
5017 bystanders in the outdoor environment were not modeled, but could potentially be exposed to  
5018 similar levels as the user.

5019  
5020 While inhalation exposure can be acute or chronic in nature, EPA does not expect consumer  
5021 exposure to be chronic in nature because product use patterns tend to be infrequent with  
5022 relatively short durations of use. As a result, we only present the acute consumer results in this  
5023 risk evaluation. Acute exposures were defined as those occurring within a single day; whereas  
5024 chronic exposures were defined as exposures comprising 10% or more of a lifetime ([U.S. EPA](#)  
5025 [2011a](#)). In addition to exposure doses, indoor air concentrations were estimated and reported as  
5026 maximum 24 hour time-weighted-averages (24 hr TWA).

5027  
5028 Thirteen distinct product categories were identified for CEM modeling. Product categories were  
5029 assigned based on the physical form of the product (aerosol, liquid, wipe, etc.) and intended use.  
5030 See Table 2-64 and Table 2-65 for groupings and the corresponding CEM parameters for each  
5031 scenario.

5032 To characterize the potential range of consumer exposures, modeling for each scenario was  
5033 conducted by varying three key parameters while keeping all other input parameters constant.  
5034 The key parameters included duration of use per event (minutes/use), amount of chemical in the  
5035 product or article (weight fraction), and mass of product or article used per event (gram/use).  
5036 Duration of use and mass of product used were assigned to each use category based on the  
5037 Westat (1987) survey of consumer behavior patterns. Each scenario was evaluated at a low,  
5038 medium, and high value (10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentiles) for duration of use and mass of product  
5039 used, based on the most representative product use category. Product weight fractions were  
5040 determined from review of product Safety Data Sheets and any other information identified  
5041 during Systematic Review. This input parameter was varied using minimum, mean and  
5042 maximum values, unless only a single product was identified for a given use scenario. Input  
5043 parameters for PCE containing consumer product scenarios modeled in CEM are given in Table  
5044 2-63 and Table 2-64. For full parametrization details see the *Draft Risk Evaluation for*  
5045 *Perchloroethylene Supplemental Information on Consumer Exposure* (U.S. EPA 2020f).  
5046

#### 5047 **Inhalation Exposure Estimation**

5048 Inhalation exposure to PCE containing products was estimated using CEM, which predicts  
5049 indoor air concentrations by implementing a deterministic, mass-balance calculation selected by  
5050 the user (see CEM 2.1 User Guide (U.S. EPA 2019b) and *Draft Risk Evaluation for*  
5051 *Perchloroethylene Supplemental Information on Consumer Exposure* (U.S. EPA 2020f)). The  
5052 model uses a two-zone representation of the building of use, with Zone 1 representing the room  
5053 where the consumer product is used and Zone 2 being the remainder of the building. Product  
5054 users and bystanders follow prescribed activity patterns and inhale airborne concentrations  
5055 determined by the activity zone. All PCE scenarios were assessed using the near-field/far-field  
5056 model option to capture the potentially higher concentration in the breathing zone of a product  
5057 user during use.

5058 Inhalation exposure to PCE as a result of proximity to recently dry cleaned articles was estimated  
5059 using MCCEM (U.S. EPA 2019e), which utilizes chemical- and article-specific emission  
5060 parameters to predict indoor air concentrations (see Section 2.4.2.2.2 for further details).

#### 5061 **Dermal Exposure Estimation**

5062 Dermal exposure to PCE from consumer product use was estimated using CEM's permeability  
5063 method (P\_DER2b). The permeability method is based on the ability of a chemical to penetrate  
5064 the skin layer once contact occurs. The model assumes a constant supply of chemical, directly in  
5065 contact with the skin, throughout the exposure duration. Evaporative loss of PCE from the skin  
5066 during product use is expected to be considerable, except in cases where the nature of use limits  
5067 evaporation, such as from the use of a solvent soaked rag, or immersion of hands in a container  
5068 of PCE based cleaner. Only product use scenarios where a reasonable assumption could be made  
5069 for limited evaporation from skin were assessed for dermal exposure. A chemical-specific skin  
5070 permeability coefficient of  $1.8 \times 10^{-2}$  cm/hr was used for permeability estimates (Nakai et al.  
5071 1999).

5072 Dermal exposure to PCE from recently dry cleaned fabrics was estimated using CEM's direct-  
5073 contact article model (A\_DER2). This model estimates dermal exposure based on the migration  
5074 rate of a chemical from an article to the skin, which is governed by the solid phase diffusion  
5075 coefficient, in combination with age-specific activity patterns to estimate potential loading on the  
5076 skin.

5077 **Exposure Receptors**

5078 Consumer use scenarios were assessed for adults (age 21+) and two youth age-groups (16-20  
5079 years and 11-15 years) as product users. All other individuals were considered as non-users  
5080 (treated as bystanders). CEM was parameterized based on characteristics of exposed populations  
5081 and receptor factors (such as age-specific body weight, skin surface area, inhalation rates, etc. all  
5082 based on Exposure Factors Handbook ([U.S. EPA 2011a](#))); user and bystander activity patterns;  
5083 building volumes and air exchange rates; and product use considerations.  
5084  
5085

5086 **Table 2-64. CEM Consumer Product Modeling Scenarios and Key Product Parameters**

Consumer Conditions of Use	Form	No. of Products Identified <sup>1</sup>	Range of Weight Fractions Identified (% PCE) <sup>2</sup>	Weight Fractions Selected for Use in Modeling (% PCE)			Selected Product Density (g/cm <sup>3</sup> ) <sup>3</sup>	Selected CEM 2.1 Modeling Scenario <sup>4</sup>	Emission Model Applied <sup>5</sup>	Dermal Exposure Model Applied <sup>6</sup>	Dermal SA/BW <sup>7</sup>
				Min	Mean	Max					
Solvent; Cleaner; Marine cleaner; Degreaser; Coil cleaner; Electric motor cleaner ; Parts cleaner; Cable cleaner; Stainless Steel Polish; Electrical/Energized Cleaner; Wire and ignition demoisurants; Electric motor cleaner	Aerosol	15	10-100	10	80	100	1.62	Degreasers	E3	P_DER1b	10% of hands
Parts cleaner	Liquid	1	50-60	50	60	---	1.34	Generic	E5	P_DER1b	Both hands
Brake Cleaner	Aerosol	14	40-100	40	91	100	1.32	Degreasers	E3	P_DER1b	10% of hands
Vandalism Mark & Stain Remover; Mold Cleaner; Weld Splatter Protectant	Aerosol	5	5-100	5	40	100	1.62	All Purpose Spray Cleaner	E3	none	n/a
Marble Polish, Stone Cleaner	Liquid	3	10-100	10	85	100	1.62	All Purpose Liquid Cleaner	E1	P_DER1b	Inside of both hands <sup>8</sup>
Cutting Fluid	Liquid	1	10	10	---	---	7.72	Non-Spray Lubricant	E1	P_DER1b	Inside of both hands
Spray Lubricant; Penetrating Oil	Aerosol	9	5-100	5	54	100	1.62	Spray Lubricant	E3	none	n/a
Industrial adhesive; Adhesive; Arts and crafts adhesive; Gun ammunition sealant	Liquid	15	30-100	30	89	100	1.31	Glues and Adhesives (small scale)	E1	none	n/a

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Consumer Conditions of Use	Form	No. of Products Identified <sup>1</sup>	Range of Weight Fractions Identified (% PCE) <sup>2</sup>	Weight Fractions Selected for Use in Modeling (% PCE)			Selected Product Density (g/cm <sup>3</sup> ) <sup>3</sup>	Selected CEM 2.1 Modeling Scenario <sup>4</sup>	Emission Model Applied <sup>5</sup>	Dermal Exposure Model Applied <sup>6</sup>	Dermal SA/BW <sup>7</sup>
				Min	Mean	Max					
Livestock Grooming Adhesive	Aerosol	1	15	15	---	---	1.45	Spray Fixative and Finishing Spray Coatings	E3	none	n/a
Column Adhesive; Caulk; Sealant	Gel/Liquid	16	5-75	5	48	75	1.19	Caulk	E1	None	n/a
Coatings and Primers	Aerosol	10	9-14	9	10	14	1.3952	Aerosol Spray Paints	E3	none	n/a
Rust primer; Sealant	Liquid	9	9-11	9	10	11	1.3952	Solvent-Based Wall Paint	E2	P_DER1b	Face, hands and arms
Sealant (Water Shield)	Liquid	1	45	45	---	---	1.28	Solvent-Based Wall Paint	E2	P_DER1b	Face, hands and arms
Metallic Overglaze (for ceramics)	Liquid	1	20-30	20	30	---	1	Lacquers and Stains	E2	none	n/a
Marble Polish, Stone Cleaner	Liquid Wax	1	85-100	85	95	100	1.4	All Purpose Waxes and Polishes	E1	P_DER1b	Inside of both hands

5087 <sup>1</sup> The number of products identified is based on the product lists in EPA's 2017 *Preliminary Information on Manufacturing, Processing, Distribution, Use, and*  
5088 *Disposal: Tetrachloroethylene (PCE) (2017f)*. It is possible that specific products and/or formulations identified in those reports and used herein to select  
5089 appropriate weight fractions, formulation types, and formulation densities for use in modeling no longer contain PCE or are no longer readily available to  
5090 consumers for purchase; however, they were still considered for sourcing such information since they were identified as in these recent EPA publications and  
5091 therefore represent reasonably-foreseen uses. See *Draft Risk Evaluation for Perchloroethylene Supplemental Information for Consumer Exposure (U.S. EPA*  
5092 *2020f)* for the full product list utilized.

5093 <sup>2</sup> The range in weight fractions is reflective of the identified products containing PCE and not reflective of hypothetical levels or theoretical functionality-based  
5094 limits. Weight fractions were sourced from product Safety Data Sheets (SDSs) or Material Safety Data Sheets (MSDSs).

5095 <sup>3</sup> Product densities were identified from product SDSs or MSDSs. When density was not reported in product MSDS or SDSs, products with high PCE weight  
5096 fractions (>90% PCE) were assumed to have the density of pure PCE (1.62 g/cm<sup>3</sup>), otherwise the product density was calculated based on the percent

5097 contribution of each ingredient per the MSDS ingredient list. See *See Draft Risk Evaluation for Perchloroethylene Supplemental Information for Consumer*  
5098 *Exposure* ([U.S. EPA 2020f](#)) for the full product list utilized.

5099 <sup>4</sup>The listed CEM 2.1 modeling scenario reflects the default product options within the model, which are prepopulated with certain default parameters. However,  
5100 due to EPA choosing to select and vary many key inputs, the specific model scenario matters less than the associated emission and dermal exposure models (e.g.,  
5101 E1, E3, P\_DER2a).

5102 <sup>5</sup>Emission models used for PCE include E1 – Emission from Product Applied to a Surface Indoors Incremental Source Model, E2 – Emission from Product  
5103 Applied to a Surface Indoors Double Exponential Model, E3 – Emission from Product Sprayed, and E5 – Emission from Product Placed in Environment.

5104 <sup>6</sup>All product scenarios utilized the P\_DER1b model for dermal exposure – Dermal Dose from Product Applied to Skin, Permeability Model.

5105 <sup>7</sup>Surface Area to Body Weight (SA/BW) ratios are default parameters for the selected CEM use scenarios, values are based on central tendency (mean) values  
5106 (Exposure Factors Handbook ([U.S. EPA 2011a](#)), CEM 2.1 User Guide ([U.S. EPA 2019b](#)))

5107 <sup>8</sup>CEM default dermal SABW ratio for the All-Purpose Liquid Cleaner category is one hand, however both hands were modeled for consistency between wax vs.  
5108 liquid stone polish use categories.

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**Table 2-65. Consumer Product Modeling Scenarios and Key Westat Product Use Parameters**

Consumer Conditions of Use	Form	Selected Westat (1987) Survey Scenario <sup>1</sup>	Room of Use <sup>2</sup>	Duration of Use (Percentile) (min)			Mass of Product Used (Percentile) (g) <sup>4</sup>		
				(10th) <sup>3</sup>	50th	95th	10th	50th	95th
Solvent; Cleaner; Marine cleaner; Degreaser; Coil cleaner; Electric motor cleaner ; Parts cleaner; Cable cleaner; Stainless Steel Polish; Electrical/Energized Cleaner; Wire and ignition demoisurants; Electric motor cleaner	Aerosol	Solvent-Type Cleaning Fluids or Degreasers	Utility Room	2	15	120	26.83	155.69	1532.91
Parts cleaner	Liquid	Spot Remover	Utility Room	0.5 (0.25)	5	30	9.91	52.70	441.01
Brake Cleaner	Aerosol	Brake Quieters/ Cleaners	Garage	1	15	120	39.03	156.13	624.52
Vandalism Mark & Stain Remover; Mold Cleaner; Weld Splatter Protectant	Aerosol	Solvent-Type Cleaning Fluids or Degreasers	Utility Room	2	15	120	26.83	155.69	1532.91
Stone Polish	Liquid	Solvent-Type Cleaning Fluids or Degreasers	Utility Room	2	15	120	26.83	155.69	1532.91
Cutting Fluid	Liquid	Other Lubricants (Excluding Automotive)	Utility Room	0.5 (0.08)	2	30	26.83	155.69	1532.91
Spray Lubricant; Penetrating Oil	Aerosol	Other Lubricants (Excluding Automotive)	Utility Room	0.5 (0.08)	2	30	4.79	26.35	239.51
Industrial adhesive; Adhesive; Arts and crafts	Liquid	Contact Cement, Super Glues, and	Utility Room	0.5 (0.33)	4.25	60	1.16	9.68	167.34

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Consumer Conditions of Use	Form	Selected Westat (1987) Survey Scenario <sup>1</sup>	Room of Use <sup>2</sup>	Duration of Use (Percentile) (min)			Mass of Product Used (Percentile) (g) <sup>4</sup>		
				(10th) <sup>3</sup>	50th	95th	10th	50th	95th
adhesive; Gun ammunition sealant		Spray Adhesives							
Livestock Grooming Adhesive	Aerosol	Contact Cement, Super Glues, and Spray Adhesives	Utility Room	0.5 (0.33)	4.25	60	1.29	10.72	185.23
Column Adhesive; Caulk; Sealant	Gel/Liquid	Primers and Special Primers (excluding automotive)	Garage	5	30	360	45.39	387.07	8121.46
Coatings and Primers	Aerosol	Aerosol Spray Paint	Utility Room	5	20	120	61.88	330.05	1608.99
Rust primer; Sealant	Liquid	Primers and Special Primers (excluding automotive)	Garage	5	30	360	53.22	453.82	9521.90
Sealant (Water Shield)	Liquid	Outdoor Water Repellent	Garage	15	60	300	302.8	2422.37	24223.74
Metallic Overglaze (for ceramics)	Liquid	Contact Cement, Super Glues, and Spray Adhesives	Utility Room	0.5 (0.33)	4.25	60	0.89	7.39	127.74
Marble and Stone Polish	Wax	Solvent-Type Cleaning Fluids or Degreasers	Utility Room	2	15	120	23.18	134.54	1324.74

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<sup>1</sup> (Westat 1987)

<sup>2</sup> Room of use is either default scenario option within CEM or based on Westat survey data for the specific product use category.



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<sup>3</sup> CEM has a minimum timestep of 0.5 min. If the 10<sup>th</sup> percentile duration of use was less than 0.5 min, then the actual 10<sup>th</sup> percentile is reported in parenthesis.

<sup>4</sup> Westat Survey scenario data for mass of product used is reported in ounces. The product density was used to convert percentile results from ounces to grams for use in CEM. As a result, mass of product used will be different for product categories with the same identified Westat Survey use scenario, but different product densities.

5118

5119 **2.4.2.3 Consumer Product Exposure Scenarios**

5120 Consumer products were assessed for human user and bystander inhalation exposure, and for user  
 5121 dermal exposure when it was reasonable to assume that use characteristics would limit product  
 5122 evaporation from skin. The results of modeled consumer scenarios are presented below, in order of the  
 5123 consumer product Categories of Use (COUs) identified in Table 2-12 (Crosswalk of Subcategories of  
 5124 Use).

5125 **2.4.2.3.1 Degreasers**

5126 PCE containing aerosol-based degreasers were identified as available for consumer use. Two sub-  
 5127 categories of degreasers were identified, general aerosol degreasers and brake cleaners, based on the  
 5128 most appropriate use scenario.  
 5129

5130 **2.4.2.3.1.1 Aerosol Cleaners for Motors, Coils, Electrical Parts, Cables, Stainless  
5131 Steel and Marine Equipment, and Wire and Ignition Demoisturants**

5132 Aerosol-based degreasers for motors, coils, electrical parts, cables, stainless steel and marine equipment,  
 5133 and wire and ignition demoisturants were identified as available for consumer use, with reported PCE  
 5134 weight fractions of 10% to 100%. Inhalation and dermal exposures were evaluated users, and inhalation  
 5135 exposures were evaluated bystanders, for three use scenarios (Table 2-66 and Table 2-67). Dermal  
 5136 exposure was considered relevant for this product category due to the large volume of liquid emitted  
 5137 from the spray can during use, and likelihood of handling product-soaked rags during normal product  
 5138 use, as per manufacturer instructional videos. Indoor maximum 24-hour time weighted average (TWA)  
 5139 air concentrations ranged from 1.5 to 869 mg/m<sup>3</sup> for users, and 0.3 to 216 mg/m<sup>3</sup> for bystanders. Dermal  
 5140 acute dose rate (ADR) ranged from 0.1 to 74 mg/kg/day across all user age groups.  
 5141

5142 **Table 2-66. Consumer inhalation exposure to PCE during use in degreasers for motors, coils,  
5143 electrical parts, cables, stainless steel and marine equipment, and wire and ignition demoisturants**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	10 <sup>th</sup> (2)	Min (10)	10 <sup>th</sup> (26.83)	User	1.5
				Bystander	0.3
<i>Moderate Intensity User</i>	50 <sup>th</sup> (15)	Mean (80)	50 <sup>th</sup> (155.69)	User	74
				Bystander	14
<i>High Intensity User<sup>1</sup></i>	95 <sup>th</sup> (120)	Max (100)	95 <sup>th</sup> (1532.91)	User	869
				Bystander	216

5144 <sup>1</sup>The maximum 24 hr TWA air concentration for the User was the 50<sup>th</sup> percentile duration -maximum weight fraction-50<sup>th</sup>  
 5145 percentile mass used iteration, with a PCE air concentration of 904 mg/m<sup>3</sup>.  
 5146

5147 **Table 2-67. Consumer dermal exposure to PCE during use in degreasers for motors, coils,  
5148 electrical parts, cables, stainless steel and marine equipment, and wire and ignition demoisturants**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor (age group)	ADR (mg/kg/d)
<i>Low Intensity User</i>	10 <sup>th</sup> (2)	Min (10)	10 <sup>th</sup> (26.83)	User, Adult (≥21 yr)	0.1
				User, Youth (16-20 yr)	0.1

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor (age group)	ADR (mg/kg/d)
				User, Youth (11-15 yr)	0.1
<i>Moderate Intensity User</i>	50 <sup>th</sup> (15)	Mean (80)	50 <sup>th</sup> (155.69)	User, Adult (≥21 yr)	7.2
				User, Youth (16-20 yr)	6.8
				User, Youth (11-15 yr)	7.4
<i>High Intensity User</i>	95 <sup>th</sup> (120)	Max (100)	95 <sup>th</sup> (1532.91)	User, Adult (≥21 yr)	72
				User, Youth (16-20 yr)	68
				User, Youth (11-15 yr)	74

5149

5150 Confidence in the selected model and default parameters is high for inhalation exposure during aerosol  
 5151 degreasing. The selected model underwent peer review, was designed explicitly for the purpose of this  
 5152 type of estimation and applied in the manner intended. Confidence in the selected inhalation emission  
 5153 scenario is high, as there was a good match in CEM. Confidence in the selected model is medium for  
 5154 dermal exposure during aerosol degreasing. CEM’s permeability model assumes limited evaporation,  
 5155 which is appropriate for aerosol degreasing considering the common use of solvent soaked rags when  
 5156 using aerosol degreasing products. However, if consumers used this product in such a way that  
 5157 evaporation was not impeded, then the selected model would be an overestimate of dermal exposure.  
 5158 Confidence in dermal model default parameters is high due to the high quality of source data.  
 5159 Confidence in the weight fraction is high as this information was pulled directly from product safety  
 5160 data sheets (SDSs). Confidence in mass used and duration of use is high due to a good match in the  
 5161 Westat survey data, which received a high- quality rating during data evaluation and has been applied in  
 5162 previous agency assessments. The overall confidence in the aerosol degreaser inhalation exposure  
 5163 estimations is high. The overall confidence in the aerosol degreaser dermal exposure estimations is  
 5164 medium with possible overestimation of dermal exposures in use scenarios where chemical evaporation  
 5165 from the hands is not impeded.  
 5166

5167

**2.4.2.3.1.2 Aerosol Brake Cleaners**

5168 Aerosol-based degreasers in the form of brake cleaners were identified as available for consumer use,  
 5169 with reported PCE weight fractions of 40% to 100%. Inhalation and dermal exposures were evaluated  
 5170 for users, and inhalation exposures were evaluated for bystanders, for three use scenarios (Table 2-68  
 5171 and Table 2-69). Dermal exposure was considered relevant for this product category due to the large  
 5172 volume of liquid emitted from the spray can during use, and likelihood of handling product-soaked rags  
 5173 during normal product use, as per manufacturer instructional videos. Indoor maximum 24-hour time  
 5174 weighted average (TWA) air concentrations ranged from 5.7 to 250 mg/m<sup>3</sup> for users, and 1.6 to 73  
 5175 mg/m<sup>3</sup> for bystanders. Dermal acute dose rate (ADR) ranged from 0.2 to 60 mg/kg/day across all user  
 5176 age groups.  
 5177

5178 **Table 2-68. Consumer inhalation exposure to PCE during use in brake cleaner**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
	10 <sup>th</sup>	Min	10 <sup>th</sup>	User	5.7

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	(1)	(40)	(39.03)	Bystander	1.6
<i>Moderate Intensity User</i>	50 <sup>th</sup> (15)	Mean (91)	50 <sup>th</sup> (156.13)	User	59
				Bystander	15
<i>High Intensity User<sup>1</sup></i>	95 <sup>th</sup> (120)	Max (100)	95 <sup>th</sup> (624.52)	User	250
				Bystander	73

<sup>1</sup>The maximum 24 hr TWI air concentration for the User was the 50<sup>th</sup> percentile duration -maximum weight fraction-95<sup>th</sup> percentile mass used iteration, with a PCE concentration of 259 mg/m<sup>3</sup>.

**Table 2-69. Consumer dermal exposure to PCE during use in brake cleaner**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor (age group)	ADR (mg/kg/d)
<i>Low Intensity User</i>	10 <sup>th</sup> (1)	Min (40)	10 <sup>th</sup> (39.03)	User, Adult (≥21 yr)	0.2
				User, Youth (16-20 yr)	0.2
				User, Youth (11-15 yr)	0.2
<i>Moderate Intensity User</i>	50 <sup>th</sup> (15)	Mean (91)	50 <sup>th</sup> (156.13)	User, Adult (≥21 yr)	6.7
				User, Youth (16-20 yr)	6.3
				User, Youth (11-15 yr)	6.9
<i>High Intensity User</i>	95 <sup>th</sup> (120)	Max (100)	95 <sup>th</sup> (624.52)	User, Adult (≥21 yr)	59
				User, Youth (16-20 yr)	55
				User, Youth (11-15 yr)	60

Confidence in the selected model and default parameters is high for inhalation exposure during brake cleaning. The selected model underwent peer review, was designed explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected inhalation emission scenario is high, as there was a good match in CEM. Confidence in the selected model is medium for dermal exposure during brake cleaning. CEM's permeability model assumes limited evaporation, which is appropriate for brake cleaning considering the common use of solvent soaked rags when using brake cleaning products. However, if consumers used this product in such a way that evaporation was not impeded, then the selected model would be an overestimate of dermal exposure. Confidence in dermal model default parameters is high due to the high quality of source data. Confidence in the weight fraction is high as this information was pulled directly from product safety data sheets (SDSs). Confidence in mass used and duration of use data is high due to a good match in the Westat survey data, which received a high- quality rating during data evaluation and has been applied in previous agency assessments. The overall confidence in the brake cleaner inhalation exposure estimations is high. The overall confidence in the brake cleaner dermal exposure estimations is medium with possible overestimation of dermal exposures in use scenarios where chemical evaporation from the hands is not impeded.

2.4.2.3.2 Parts Cleaners

Liquid-based parts cleaner (wipe or immersive) was identified as available for consumer use, with reported PCE weight fraction of 50% to 60%. Inhalation and dermal exposures were evaluated for users, and inhalation exposures were evaluated for bystanders, for three use scenarios (Table 2-70 and Table 2-71). Indoor maximum 24-hour time weighted average (TWA) air concentrations ranged from 0.4 to 161 mg/m<sup>3</sup> for users, and 6.5E-02 to 29 mg/m<sup>3</sup> for bystanders. Dermal acute dose rate (ADR) ranged from 25 to 2030 mg/kg/day across all user age groups.

**Table 2-70. Consumer inhalation exposure to PCE during use in parts cleaners**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	10 <sup>th</sup> (0.25) <sup>2</sup>	Min (50)	10 <sup>th</sup> (9.91)	User	0.3
				Bystander	6.5E-02
<i>Moderate Intensity User</i>	50 <sup>th</sup> (5)	Max (60) <sup>1</sup>	50 <sup>th</sup> (52.70)	User	19
				Bystander	3.5
<i>High Intensity User</i>	95 <sup>th</sup> (30)	Max (60)	95 <sup>th</sup> (441.01)	User	161
				Bystander	29

<sup>1</sup>A single product was identified for immersive and/or wipe cleaning, with a range given for the weight fraction. The weight fraction range was evaluated as minimum and maximum, with no average weight fraction used in modeling.

<sup>2</sup>CEM has a minimum timestep of 0.5 minutes. If the 10<sup>th</sup> percentile duration is less 0.5 min, then the minimum timestep was used for modeling, rather than the percentile.

**Table 2-71. Consumer dermal exposure to PCE during use in parts cleaners**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor (age group)	ADR (mg/kg/d)
<i>Low Intensity User</i>	10 <sup>th</sup> (0.25) <sup>2</sup>	Min (50)	10 <sup>th</sup> (9.91)	User, Adult (≥21 yr)	25
				User, Youth (16-20 yr)	26
				User, Youth (11-15 yr)	28
<i>Moderate Intensity User</i>	50 <sup>th</sup> (5)	Max (60) <sup>1</sup>	50 <sup>th</sup> (52.70)	User, Adult (≥21 yr)	296
				User, Youth (16-20 yr)	310
				User, Youth (11-15 yr)	338
<i>High Intensity User</i>	95 <sup>th</sup> (30)	Max (60)	95 <sup>th</sup> (441.01)	User, Adult (≥21 yr)	1780
				User, Youth (16-20 yr)	1860
				User, Youth (11-15 yr)	2030

<sup>1</sup>A single product was identified for immersive and/or wipe cleaning, with a range given for the weight fraction. The weight fraction range was evaluated as minimum and maximum, with no average weight fraction used in modeling.

<sup>2</sup>CEM has a minimum timestep of 0.5 minutes. If the 10<sup>th</sup> percentile duration is less 0.5 min, then the minimum timestep was used for modeling, rather than the percentile.

Confidence in the selected model and default parameters is high for inhalation exposure during immersive parts cleaning estimation, as this model underwent peer review, was designed explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected inhalation emission scenario is high. A generic emission model (E5) was selected in CEM due to the lack of an existing scenario that would represent a good fit for immersive parts cleaning. However, the

selected emission model is a good fit for this condition of use. Confidence in the selected model is medium for dermal exposure during immersive parts cleaning. CEM's permeability model assumes limited evaporation, which is appropriate considering the likelihood of a user immersing their hands in an immersive cleaning product during use. However, if consumers used this product in such a way that evaporation was not impeded, then the selected model would be an overestimate of dermal exposure. Confidence in dermal model default parameters is high due to the high quality of source data. Confidence in the weight fraction is high as this information was pulled directly from product safety data sheets (SDSs). Confidence in the mass used and duration of use is medium. Lacking an exact match in the Westat survey for immersive parts cleaning, the spot remover scenario was selected to parameterize CEM. The spot remover scenario was of relatively short duration and low mass of product used, and thus the results may underestimate the inhalation exposure for immersive parts cleaning. The overall confidence in the immersive parts cleaner inhalation exposure estimations is medium, with possible underestimation of inhalation exposures. The overall confidence in the immersive parts cleaner dermal exposure estimations is medium with possible overestimation of dermal exposures in use scenarios where chemical evaporation from the hands is not impeded.

#### 2.4.2.3.3 Vandalism Stain Removers, Mold Cleaners, and Weld Splatter Protectants

Aerosol-based mark and stain removers and splatter protectors were identified as available for consumer use, with reported PCE weight fractions of 5% to 100%. Inhalation exposures were evaluated for users, and for bystanders, for three use scenarios ( Table 2-72). Indoor maximum 24-hour time weighted average (TWA) air concentrations ranged from 0.7 to 869 mg/m<sup>3</sup> for users, and 0.2 to 216 mg/m<sup>3</sup> for bystanders.

**Table 2-72. Consumer inhalation exposure to PCE during use in vandalism stain removers, mold cleaners, weld splatter protectants**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	10 <sup>th</sup> (2)	Min (5)	10 <sup>th</sup> (26.83)	User	0.7
				Bystander	0.2
<i>Moderate Intensity User</i>	50 <sup>th</sup> (15)	Mean (40)	50 <sup>th</sup> (155.69)	User	37
				Bystander	7.2
<i>High Intensity User</i>	95 <sup>th</sup> (120)	Max (100)	95 <sup>th</sup> (1532.91)	User	869
				Bystander	216

Confidence in the selected model and default parameters is high for estimation of inhalation exposure during use of stain removers, mold cleaner and splatter protectors, as this model underwent peer review, was designed explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected inhalation emission scenario is high, as there was a good match in CEM. Confidence in the weight fraction is high as this information was pulled directly from product safety data sheets (SDSs). Confidence in mass used and duration of use data is high due to a good match in the Westat survey data, which received a high quality rating during data evaluation and has been applied in previous agency assessments. The overall confidence in the inhalation exposure estimation for use of stain removers, mold cleaners and splatter protectors is high.

#### 2.4.2.3.4 Marble Polish

A liquid-based stone polish was identified as available for consumer use, with reported PCE weight fraction of 10% to 100%. Inhalation and dermal exposures were evaluated for users, and inhalation exposures were evaluated for bystanders, for three use scenarios (Table 2-73 and Table 2-74). Indoor maximum 24-hour time weighted average (TWA) air concentrations ranged from 3.4 to 911 mg/m<sup>3</sup> for users, and 0.7 to 227 mg/m<sup>3</sup> for bystanders. Dermal acute dose rate (ADR) ranged from 1.1 to 739 mg/kg/day across all user age groups.

**Table 2-73. Consumer inhalation exposure to PCE during use in marble polish**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	10 <sup>th</sup> (2)	Min (10)	10 <sup>th</sup> (26.83)	User	3.4
				Bystander	0.7
<i>Moderate Intensity User</i>	50 <sup>th</sup> (15)	Mean (85)	50 <sup>th</sup> (155.69)	User	166
				Bystander	32
<i>High Intensity User</i>	95 <sup>th</sup> (120)	Max (100)	95 <sup>th</sup> (1532.91)	User	911
				Bystander	227

**Table 2-74. Consumer dermal exposure to PCE during use in marble polish**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor (age group)	ADR (mg/kg/d)
<i>Low Intensity User</i>	10 <sup>th</sup> (2)	Min (10)	10 <sup>th</sup> (26.83)	User, Adult (≥21 yr)	1.2
				User, Youth (16-20 yr)	1.1
				User, Youth (11-15 yr)	1.2
<i>Moderate Intensity User</i>	50 <sup>th</sup> (15)	Mean (85)	50 <sup>th</sup> (155.69)	User, Adult (≥21 yr)	77
				User, Youth (16-20 yr)	72
				User, Youth (11-15 yr)	79
<i>High Intensity User</i>	95 <sup>th</sup> (120)	Max (100)	95 <sup>th</sup> (1532.91)	User, Adult (≥21 yr)	722
				User, Youth (16-20 yr)	676
				User, Youth (11-15 yr)	739

Confidence in the selected model and default parameters is high for inhalation exposure during marble polish use. The selected model underwent peer review, was designed explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected inhalation emission scenario is high, as there was a good match in CEM. The utility room was selected as the room of use for this scenario. While it is also reasonable to assume that marble polish may be used in the kitchen, the room volumes are similar and air exchange rates identical, resulting in similar user inhalation exposure. However, a difference may occur for the bystander inhalation exposure when considering utility room use versus kitchen use, based on bystander activity patterns. For example, amount of time the bystander spends in the kitchen is greater than time spent in the utility room, resulting in a lower bystander inhalation exposure for the utility room scenario. If the product was used in the kitchen, the bystander inhalation exposure would be greater than estimated, up to the air concentration experienced by the user. Confidence in the selected model is medium for dermal exposure during marble polish use. CEM's

5287 permeability model assumes limited evaporation, which is appropriate for marble polish considering the  
 5288 common use of solvent soaked rags when using marble cleaning products. However, if consumers used  
 5289 this product in such a way that evaporation was not impeded, then the selected model would be an  
 5290 overestimate of dermal exposure. Confidence in dermal model default parameters is high due to the high  
 5291 quality of source data. Confidence in the weight fraction is high as this information was pulled directly  
 5292 from product safety data sheets (SDSs). Confidence in mass used and duration of use data is high due to  
 5293 a good match in the Westat survey data, which received a high- quality rating during data evaluation and  
 5294 has been applied in previous agency assessments. The overall confidence in the marble polish user  
 5295 inhalation exposure estimations is high, with possible underestimation of bystander inhalation exposures  
 5296 if the room of use changed. The overall confidence in the marble polish use dermal exposure estimations  
 5297 is medium with possible overestimation of dermal exposures in use scenarios where chemical  
 5298 evaporation from the hands is not impeded.

5299

#### 2.4.2.3.5 Cutting Fluid

5300 Cutting fluid was identified as available for consumer use, with a reported PCE weight fraction of 10%.  
 5301 Inhalation exposures were evaluated for users, and inhalation exposures were evaluated for bystanders,  
 5302 for three use scenarios ( Table 2-75). Indoor maximum 24-hour time weighted average (TWA) air  
 5303 concentrations ranged from 1.4 to 91 mg/m<sup>3</sup> for users, and 0.3 to 19 mg/m<sup>3</sup> for bystanders.  
 5304

5305 **Table 2-75. Consumer inhalation exposure to PCE during use in cutting fluids**

Scenario Description	Duration Percentile (min)	Weight Fraction <sup>1</sup> (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	10 <sup>th</sup> (0.08) <sup>2</sup>	Single (10)	10 <sup>th</sup> (26.83)	User	1.4
				Bystander	0.3
<i>Moderate Intensity User</i>	50 <sup>th</sup> (2)	Single (10)	50 <sup>th</sup> (155.69)	User	8.5
				Bystander	1.7
<i>High Intensity User</i>	95 <sup>th</sup> (30)	Single (10)	95 <sup>th</sup> (1532.91)	User	91
				Bystander	19

5306 <sup>1</sup>A single product was identified for cutting fluid, with a single weight fraction reported.

5307 <sup>2</sup>CEM has a minimum timestep of 0.5 minutes. If the 10<sup>th</sup> percentile duration is less 0.5 min, then the minimum timestep was  
 5308 used for modeling, rather than the percentile.  
 5309

5310 Confidence in the selected model and default parameters is high for estimation of inhalation exposure  
 5311 during use of cutting fluids, as this model underwent peer review, was designed explicitly for the  
 5312 purpose of this type of estimation and applied in the manner intended. Confidence in the selected  
 5313 inhalation emission scenario is high, as there was a good match in CEM. Confidence in the weight  
 5314 fraction is high as this information was pulled directly from product safety data sheets (SDSs).  
 5315 Confidence in mass used and duration of use data is high due to a good match in the Westat survey data,  
 5316 which received a high quality rating during data evaluation and has been applied in previous agency  
 5317 assessments. The overall confidence in the inhalation exposure estimation during use of cutting fluids is  
 5318 high.  
 5319

#### 5320 2.4.2.3.6 Lubricants and Penetrating Oils (aerosol)

5321 Aerosol-based lubricants and penetrating oils were identified as available for consumer use, with  
 5322 reported PCE weight fractions of 5% to 100%. Inhalation exposures were evaluated for users, and



5323 inhalation exposures were evaluated for bystanders, for three use scenarios ( Table 2-76). Indoor  
 5324 maximum 24-hour time weighted average (TWA) air concentrations ranged from 0.1 to 142 mg/m<sup>3</sup> for  
 5325 users, and 2.6E-02 to 29 mg/m<sup>3</sup> for bystanders.  
 5326  
 5327

**Table 2-76. Consumer inhalation exposure to PCE during use in lubricating and penetrating oils**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	10 <sup>th</sup> (0.08) <sup>1</sup>	Min (5)	10 <sup>th</sup> (4.79)	User	0.1
				Bystander	2.6E-02
<i>Moderate Intensity User</i>	50 <sup>th</sup> (2)	Mean (54)	50 <sup>th</sup> (26.35)	User	7.9
				Bystander	1.6
<i>High Intensity User</i>	95 <sup>th</sup> (30)	Max (100)	95 <sup>th</sup> (239.51)	User	142
				Bystander	29

5328 <sup>1</sup>CEM has a minimum timestep of 0.5 minutes. If the 10<sup>th</sup> percentile duration is less 0.5 min, then the minimum timestep was  
 5329 used for modeling, rather than the percentile.  
 5330

5331 Confidence in the selected model and default parameters is high for estimation of inhalation exposure  
 5332 during use of aerosol lubricants and penetrating oils, as this model underwent peer review, was designed  
 5333 explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in  
 5334 the selected inhalation emission scenario is high, as there was a good match in CEM. Confidence in the  
 5335 weight fraction is high as this information was pulled directly from product safety data sheets (SDSs).  
 5336 Confidence in mass used and duration of use data is high due to a good match in the Westat survey data,  
 5337 which received a high quality rating during data evaluation and has been applied in previous agency  
 5338 assessments. The overall confidence in the inhalation exposure estimation during use of aerosol  
 5339 lubricants and penetrating oils is high.  
 5340

#### 5341 2.4.2.3.7 Adhesives

5342 Industrial adhesives, arts and crafts adhesives, and gun ammunition sealant was identified as available  
 5343 for consumer use, with PCE weight fractions of 10% to 100%. Inhalation exposures were evaluated for  
 5344 users, and inhalation exposures were evaluated for bystanders, for three use scenarios ( Table 2-77).  
 5345 Indoor maximum 24-hour time weighted average (TWA) air concentrations ranged from 0.2 to 90  
 5346 mg/m<sup>3</sup> for users, and 3.8E-02 to 23 mg/m<sup>3</sup> for bystanders.  
 5347  
 5348

**Table 2-77. Consumer inhalation exposure to PCE during use in adhesives**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	10 <sup>th</sup> (0.33) <sup>2</sup>	Min (30)	10 <sup>th</sup> (1.16)	User	0.2
				Bystander	3.8E-02
<i>Moderate Intensity User</i>	50 <sup>th</sup> (4.25)	Mean (89)	50 <sup>th</sup> (9.68)	User	4.9
				Bystander	1.0
<i>High Intensity User<sup>1</sup></i>	95 <sup>th</sup> (60)	Max (100)	95 <sup>th</sup> (167.34)	User	90
				Bystander	23

<sup>1</sup>The maximum 24 hr TWA air concentration for the User was the 50<sup>th</sup> percentile duration-maximum weight fraction-95<sup>th</sup> percentile mass used iteration, with a PCE concentration of 94 mg/m<sup>3</sup>.  
<sup>2</sup>CEM has a minimum timestep of 0.5 minutes. If the 10<sup>th</sup> percentile duration is less 0.5 min, then the minimum timestep was used for modeling, rather than the percentile.

Confidence in the selected model and default parameters is high for estimation of inhalation exposure during adhesive use, as this model underwent peer review, was designed explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected inhalation emission scenario is high, as there was a good match in CEM. Confidence in the weight fraction is high as this information was pulled directly from product safety data sheets (SDSs). Confidence in mass used and duration of use data is high due to a good match in the Westat survey data, which received a high quality rating during data evaluation and has been applied in previous agency assessments. The overall confidence in the inhalation exposure estimation during use of adhesives is high.

**2.4.2.3.8 Livestock Grooming Adhesive (aerosol)**

Livestock grooming adhesive spray was identified as available for consumer use, with a reported PCE weight fraction of 15%. Inhalation exposures were evaluated for users, and inhalation exposures were evaluated for bystanders, for three use scenarios ( Table 2-78). Use was modeled indoors, as product may be used a or horse stable or other enclosed space. Indoor maximum 24-hour time weighted average (TWA) concentrations ranged from 0.1 to 15 mg/m<sup>3</sup> for users, and 2.1E-02 to 3.7 mg/m<sup>3</sup> for bystanders.

**Table 2-78. Consumer inhalation exposure to PCE during use in livestock grooming adhesive**

Scenario Description	Duration Percentile (min)	Weight Fraction <sup>1</sup> (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	10 <sup>th</sup> (0.33) <sup>3</sup>	Single (15)	10 <sup>th</sup> (1.29)	User	0.1
				Bystander	2.1E-02
<i>Moderate Intensity User</i>	50 <sup>th</sup> (4.25)	Single (15)	50 <sup>th</sup> (10.72)	User	0.9
				Bystander	0.2
<i>High Intensity User<sup>2</sup></i>	95 <sup>th</sup> (60)	Single (15)	95 <sup>th</sup> (185.23)	User	15
				Bystander	3.7

<sup>1</sup>A single product was identified for livestock grooming adhesive, with a single reported weight fraction.  
<sup>2</sup>CEM has a minimum timestep of 0.5 minutes. If the 10<sup>th</sup> percentile duration is less 0.5 min, then the minimum timestep was used for modeling, rather than the percentile.  
<sup>3</sup>The maximum 24 hr TWA air concentration for the User was the 50<sup>th</sup> percentile duration -single weight fraction-95<sup>th</sup> percentile iteration, with a PCE concentration of 16 mg/m<sup>3</sup>.

Confidence in the selected model and default parameters is high for estimation of inhalation exposure during livestock grooming adhesive use, as this model underwent peer review, was designed explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected inhalation emission scenario is high, as there was a good match in CEM. The utility room was selected as the room of use for this scenario, assuming the product was used as a general spray fixative. If the product was used in a barn the inhalation exposure would be reduced. Confidence in the weight fraction is high as this information was pulled directly from product safety data sheets (SDSs). Confidence in mass used and duration of use data is high due to a good match in the Westat survey data, which received a high quality rating during data evaluation and has been applied in previous agency assessments. The overall confidence in the inhalation exposure estimation during use of livestock

5386 grooming adhesive is high, but overestimate exposures if the product is used in a barn rather than a  
5387 utility room.

#### 5388 **2.4.2.3.9 Caulks, Sealants and Column Adhesives**

5389 Caulks, sealants and column adhesives were identified as available for consumer use, with reported PCE  
5390 weight fractions of 5% to 75%. Inhalation exposures were evaluated for users, for three use scenarios  
5391 (Table 2-79). Area of use was assumed to be outdoors, so bystander exposure was not estimated. A  
5392 modified garage with a high air exchange rate was used to model outdoor use. Maximum 24-hour time  
5393 weighted average (TWA) air concentrations ranged from 5.9E-02 to 159 mg/m<sup>3</sup> for users.

5394  
5395 **Table 2-79. Consumer inhalation exposure to PCE during use in caulks, sealants and column**  
5396 **adhesives**

<b>Scenario Description</b>	<b>Duration Percentile (min)</b>	<b>Weight Fraction (%)</b>	<b>Mass Used Percentile (g)</b>	<b>Exposed Receptor</b>	<b>24 hr Max TWA (mg/m<sup>3</sup>)</b>
<i>Low Intensity User</i>	10 <sup>th</sup> (5)	Min (5)	10 <sup>th</sup> (45.39)	User	5.9E-02
<i>Moderate Intensity User</i>	50 <sup>th</sup> (30)	Mean (48)	50 <sup>th</sup> (387.07)	User	4.8
<i>High Intensity User</i>	95 <sup>th</sup> (360)	Max (75)	95 <sup>th</sup> (8121.46)	User	159

5397  
5398 Confidence in the selected model and default parameters is high for estimation of inhalation exposure  
5399 from caulks, sealants and column adhesives, as this model underwent peer review, was designed  
5400 explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in  
5401 the selected inhalation emission scenario is high, as there was a good match in CEM. A modified garage  
5402 with a high air exchange rate was used to model outdoor use, resulting in no bystander exposure. Greater  
5403 user and bystander inhalation exposure would be expected for use of caulk and column adhesive  
5404 products indoors. Confidence in the weight fraction is high as this information was pulled directly from  
5405 product safety data sheets (SDSs). Confidence in mass used and duration of use data is medium as there  
5406 was not an exact match in the Westat survey data. As such, the primers and special primers (non-  
5407 automotive) scenario was selected. It may be that primers are used for longer periods and in larger  
5408 quantities than caulks, sealants and column adhesives, and thus the selected scenario may overestimate  
5409 inhalation exposure. The overall confidence in the inhalation exposure estimation from caulks, sealants  
5410 and column adhesives is medium with the possibility of overestimation based on selected scenario mass  
5411 used and duration of use parameters, and/or underestimation of exposures, particularly for bystanders,  
5412 based on the assumption of outdoor product use.

#### 5413 **2.4.2.3.10 Outdoor Water Shield**

5414 Liquid-based outdoor water sealant was identified as available for consumer use, with a reported weight  
5415 fraction of 45%. Inhalation and dermal exposures were evaluated for users, and inhalation exposures  
5416 were evaluated for bystanders, for three use scenarios ( Table 2-80 and Table 2-81). Indoor maximum  
5417 24-hour time weighted average (TWA) air concentrations  
5418 ranged from 1.5 to 127 mg/m<sup>3</sup> for users, and 0.4 to 33 mg/m<sup>3</sup> for bystanders. Dermal acute dose rate  
5419 (ADR) ranged from 39 to 851 mg/kg/day across all user age groups.

5420

5421 **Table 2-80. Consumer inhalation exposure to PCE during use in outdoor water shield sealants**

Scenario Description	Duration Percentile (min)	Weight Fraction <sup>1</sup> (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i> <sup>2</sup>	10 <sup>th</sup> (15)	Single (45)	10 <sup>th</sup> (302.8)	User	1.5
				Bystander	0.4
<i>Moderate Intensity User</i>	50 <sup>th</sup> (60)	Single (45)	50 <sup>th</sup> (2422.37)	User	10
				Bystander	3.4
<i>High Intensity User</i> <sup>3</sup>	95 <sup>th</sup> (300)	Single (45)	95 <sup>th</sup> (24223.74)	User	127
				Bystander	33

5422 <sup>1</sup>A single product was identified for outdoor water shield, with a single reported weight fraction.5423 <sup>2</sup>The minimum 24 hr TWA air concentration for the User was the 50<sup>th</sup> percentile duration-single weight fraction-10<sup>th</sup> percentile mass used iteration, with a PCE concentration of 1.3 mg/m<sup>3</sup>.5424 <sup>3</sup>The maximum 24 hr TWA air concentration for the Bystander was the 50<sup>th</sup> percentile duration-single weight fraction-95<sup>th</sup> percentile mass used iteration, with a PCE concentration of 34 mg/m<sup>3</sup>.5425  
5426  
5427  
5428 **Table 2-81. Consumer dermal exposure to PCE during use in outdoor water shield sealants**

Scenario Description	Duration Percentile (min)	Weight Fraction <sup>1</sup> (%)	Mass Used Percentile (g)	Exposed Receptor (age group)	ADR (mg/kg/d)
<i>Low Intensity User</i>	10 <sup>th</sup> (15)	Single (45)	10 <sup>th</sup> (302.8)	User, Adult (≥21 yr)	41
				User, Youth (16-20 yr)	39
				User, Youth (11-15 yr)	42
<i>Moderate Intensity User</i>	50 <sup>th</sup> (60)	Single (45)	50 <sup>th</sup> (2422.37)	User, Adult (≥21 yr)	163
				User, Youth (16-20 yr)	155
				User, Youth (11-15 yr)	170
<i>High Intensity User</i>	95 <sup>th</sup> (300)	Single (45)	95 <sup>th</sup> (24223.74)	User, Adult (≥21 yr)	815
				User, Youth (16-20 yr)	774
				User, Youth (11-15 yr)	851

5429 <sup>1</sup>A single product was identified for outdoor water shield, with a single reported weight fraction.

5430  
5431 Confidence in the selected model and default parameters is high for inhalation exposure during use of an  
5432 outdoor water sealant. The selected model underwent peer review, was designed explicitly for the  
5433 purpose of this type of estimation and applied in the manner intended. Confidence in the selected  
5434 inhalation emission scenario is high, as there was a good match in CEM. The garage was selected as the  
5435 room of use for this scenario, assuming application of waterproofing sealant to an item that will later be  
5436 installed outside. If the product were used outside inhalation exposures would be reduced. Confidence in  
5437 the selected model is medium for dermal exposure during use of an outdoor water sealant. CEM's  
5438 permeability model assumes limited evaporation, which may be appropriate for liquid sealant  
5439 considering a large volume is generally used with significant potential for coating of skin during use.  
5440 However, if consumers used this product in such a way that evaporation was not impeded, or dermal  
5441 exposure was limited, then the selected model would be an overestimate of dermal exposure. Confidence  
5442 in dermal model default parameters is high due to the high quality of source data. Confidence in the  
5443 weight fraction is high as this information was pulled directly from product safety data sheets (SDSs).  
5444 Confidence in mass used and duration of use data is high due to a good match in the Westat survey data,  
5445 which received a high quality rating during data evaluation and has been applied in previous agency

5446 assessments. The overall confidence in inhalation exposure estimations during use of an outdoor water  
 5447 sealant is high, but possibly overestimates inhalation exposure if the product were to be used outside,  
 5448 rather than inside a garage. The overall confidence in dermal exposure estimations during use of an  
 5449 outdoor water sealant is medium with possible overestimation of dermal exposures in use scenarios  
 5450 where chemical evaporation is not impeded or dermal contact is limited.

#### 5451 **2.4.2.3.11 Aerosol Coatings and Primers**

5452 Aerosol-based rust primers and battery reconditioners were identified as available for consumer use,  
 5453 with reported PCE weight fractions of 9% to 14%. Inhalation exposures were evaluated for users and  
 5454 bystanders, for three use scenarios ( Table 2-82). Indoor maximum 24-hour time weighted average  
 5455 (TWA) air concentrations ranged from 2.2E-02 to 1.9 mg/m<sup>3</sup> for users, and 8.4E-04 to 5.4E-02 mg/m<sup>3</sup>  
 5456 for bystanders.

5458 **Table 2-82. Consumer inhalation exposure to PCE during use in aerosol coatings and primers**

<b>Scenario Description</b>	<b>Duration Percentile (min)</b>	<b>Weight Fraction (%)</b>	<b>Mass Used Percentile (g)</b>	<b>Exposed Receptor</b>	<b>24 hr Max TWA (mg/m<sup>3</sup>)</b>
<i>Low Intensity User</i>	10 <sup>th</sup> (5)	Min (9)	10 <sup>th</sup> (61.88)	User	2.2E-02
				Bystander	8.4E-04
<i>Moderate Intensity User</i>	50 <sup>th</sup> (20)	Mean (10)	50 <sup>th</sup> (330.05)	User	0.2
				Bystander	5.3E-03
<i>High Intensity User</i>	95 <sup>th</sup> (120)	Max (14)	95 <sup>th</sup> (1608.99)	User	1.9
				Bystander	5.4E-02

5459 Confidence in the selected model and default parameters is high for estimation of inhalation exposure  
 5460 from use of aerosol coatings and primers, as this model underwent peer review, was designed explicitly  
 5461 for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected  
 5462 inhalation emission scenario is high, as there was a good match in CEM. Confidence in the weight  
 5463 fraction is high as this information was pulled directly from product safety data sheets (SDSs).  
 5464 Confidence in mass used and duration of use data is high as there is a good match in the Westat survey  
 5465 data. The overall confidence in the inhalation exposure estimation from use of aerosol coatings and  
 5466 primers is high.

#### 5468 **2.4.2.3.12 Liquid Primers and Sealants**

##### 5470 **Rust Primer**

5471 Liquid-based rust primer and sealant was identified as available for consumer use, with reported PCE  
 5472 weight fractions of 9% to 11%. Inhalation and dermal exposures were evaluated for users, and inhalation  
 5473 exposures were evaluated for bystanders, for three use scenarios (Table 2-83 and Table 2-84). Indoor use  
 5474 was assumed as a more conservative estimate of consumer exposure. Consumer exposure would likely  
 5475 be lower if the product was used outdoors. Indoor maximum 24-hour time weighted average (TWA) air  
 5476 concentrations ranged from 1.1E-03 to 0.3 mg/m<sup>3</sup> for users, and 8.8E-05 to 4.9E-02 mg/m<sup>3</sup> for  
 5477 bystanders. Dermal acute dose rate (ADR) ranged from 2.8 to 272 mg/kg/day across all user age groups.  
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**Table 2-83. Consumer inhalation exposure to PCE during use in rust primers and sealants**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i> <sup>1</sup>	10 <sup>th</sup> (5)	Min (9)	10 <sup>th</sup> (53.22)	User	1.1E-03
				Bystander	8.8E-05
<i>Moderate Intensity User</i>	50 <sup>th</sup> (30)	Mean (10)	50 <sup>th</sup> (453.82)	User	9.7E-03
				Bystander	9.1E-04
<i>High Intensity User</i>	95 <sup>th</sup> (360)	Max (11)	95 <sup>th</sup> (9521.90)	User	0.3
				Bystander	4.9E-02

<sup>1</sup>The minimum 24 hr TWA air concentration for the User was the 50<sup>th</sup> percentile duration-minimum weight fraction-10<sup>th</sup> percentile mass used iteration, with a PCE concentration of 1.0E-03 mg/m<sup>3</sup>.

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**Table 2-84. Consumer dermal exposure to PCE during use in rust primers and sealants**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor (age group)	ADR (mg/kg/d)
<i>Low Intensity User</i>	10 <sup>th</sup> (5)	Min (9)	10 <sup>th</sup> (53.22)	User, Adult (≥21 yr)	3.0
				User, Youth (16-20 yr)	2.8
				User, Youth (11-15 yr)	3.1
<i>Moderate Intensity User</i>	50 <sup>th</sup> (30)	Mean (10)	50 <sup>th</sup> (453.82)	User, Adult (≥21 yr)	237
				User, Youth (16-20 yr)	225
				User, Youth (11-15 yr)	247
<i>High Intensity User</i>	95 <sup>th</sup> (360)	Max (11)	95 <sup>th</sup> (9521.90)	User, Adult (≥21 yr)	261
				User, Youth (16-20 yr)	248
				User, Youth (11-15 yr)	272

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Confidence in the selected model and default parameters is high for inhalation exposure during use of liquid rust primers. The selected model underwent peer review, was designed explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected inhalation emission scenario is high as there was a good match in CEM. Confidence in the selected model is medium for dermal exposure during use of liquid rust primers. CEM's permeability model assumes limited evaporation, which may be appropriate for liquid rust primers considering a large volume may be used with potential for coating of skin during use. However, if consumers used this product in such a way that evaporation was not impeded, or dermal exposure was limited, then the selected model would be an overestimate of dermal exposure. Confidence in dermal model default parameters is high due to the high quality of source data. Confidence in the weight fraction is high as this information was pulled directly from product safety data sheets (SDSs). Confidence in mass used and duration of use data is high due to a good match in the Westat survey data, which received a high quality rating during data evaluation and has been applied in previous agency assessments. The product was assumed to be used indoors, which represents a reasonable, but likely more conservative, exposure estimate than if outdoor use had been assumed. The overall confidence in inhalation exposure estimations during use of liquid rust primers is high, however outdoor use would likely result in lower consumer inhalation exposure. The overall confidence in dermal exposure estimations during use liquid rust primers is medium with possible overestimation of dermal exposures in use scenarios where chemical evaporation is not impeded or dermal contact is limited.

### 2.4.2.3.13 Metallic Overglaze

Metallic overglaze for ceramics was identified as available for consumer use, with a reported PCE weight fractions of 20 to 30%. Inhalation and dermal exposures were evaluated for users, and inhalation exposures were evaluated for bystanders, for three use scenarios (Table 2-85). Indoor maximum 24-hour time weighted average (TWA) air concentrations ranged from 2.6E-03 to 0.5 mg/m<sup>3</sup> for users, and 5.4E-04 to 0.1 mg/m<sup>3</sup> for bystanders.

**Table 2-85. Consumer inhalation exposure to PCE during use in metallic overglaze**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i> <sup>1</sup>	10 <sup>th</sup> (0.33) <sup>4</sup>	Min (20)	10 <sup>th</sup> (0.89)	User	2.6E-03
				Bystander	5.4E-04
<i>Moderate Intensity User</i> <sup>2</sup>	50 <sup>th</sup> (4.25)	Max (30)	50 <sup>th</sup> (7.39)	User	3.4E-02
				Bystander	6.8E-03
<i>High Intensity User</i> <sup>3</sup>	95 <sup>th</sup> (60)	Max (30)	95 <sup>th</sup> (127.74)	User	0.5
				Bystander	0.1

<sup>1</sup>The minimum 24 hr TWA air concentration for the User was the 95<sup>th</sup> percentile duration-minimum weight fraction-10<sup>th</sup> percentile mass used iteration, with a PCE concentration of 2.5E-03 mg/m<sup>3</sup>.

<sup>2</sup>A single product was identified for metallic overglaze, with a range given for the weight fraction. The weight fraction range was evaluated as minimum and maximum, with no average weight fraction used in modeling.

<sup>3</sup>The maximum 24 hr TWA air concentration for the User was the 50<sup>th</sup> percentile duration-maximum weight fraction-95<sup>th</sup> percentile mass used iteration, with a PCE concentration of 0.6 mg/m<sup>3</sup>.

<sup>4</sup>CEM has a minimum timestep of 0.5 minutes. If the 10<sup>th</sup> percentile duration is less 0.5 min, then the minimum timestep was used for modeling, rather than the percentile.

Confidence in the selected model and default parameters is high for estimation of inhalation exposure from use of metallic overglaze, as this model underwent peer review, was designed explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected inhalation emission scenario is high, as there was a good match in CEM. Confidence in the weight fraction is high as this information was pulled directly from product safety data sheets (SDSs). Confidence in mass used and duration of use data is medium as there was not an exact match in the Westat survey data. As such, the Contact Cement, Super Glues and Spray Adhesives scenario was selected. Metallic overglaze is sold in small quantities, and thus the 95<sup>th</sup> percentile mass used for the selected scenario is likely an overestimate for pottery glazing applications. The overall confidence in the inhalation exposure estimation from use of metallic overglaze is medium due to possible overestimation of inhalation exposure for the high intensity user.

### 2.4.2.3.14 Metal and Stone Polish

Liquid wax-based polishes for metal and stone were identified as available for consumer use, with reported PCE weight fraction of 85% to 100%. Inhalation and dermal exposures were evaluated for users, and inhalation exposures were evaluated for bystanders, for three use scenarios (Table 2-86 and Table 2-87). Indoor maximum 24-hour time weighted average (TWA) air concentrations ranged from 11 to 750 mg/m<sup>3</sup> for users, and 2.2 to 187 mg/m<sup>3</sup> for bystanders. Dermal acute dose rate (ADR) ranged from 4.1 to 319 mg/kg/day across all user age groups.

5541 **Table 2-86. Consumer inhalation exposure to PCE during use in wax-based metal and stone polish**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor	24 hr Max TWA (mg/m <sup>3</sup> )
<i>Low Intensity User</i>	10 <sup>th</sup> (2)	Min (85)	10 <sup>th</sup> (23.18)	User	11
				Bystander	2.2
<i>Moderate Intensity User</i>	50 <sup>th</sup> (15)	Mean (95)	50 <sup>th</sup> (134.54)	User	76
				Bystander	15
<i>High Intensity User</i>	95 <sup>th</sup> (120)	Max (100)	95 <sup>th</sup> (1324.74)	User	750
				Bystander	187

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**Table 2-87. Consumer dermal exposure to PCE during use in wax-based metal and stone polish**

Scenario Description	Duration Percentile (min)	Weight Fraction (%)	Mass Used Percentile (g)	Exposed Receptor (age group)	ADR (mg/kg/d)
<i>Low Intensity User</i>	10 <sup>th</sup> (2)	Min (85)	10 <sup>th</sup> (23.18)	User, Adult (≥21 yr)	4.4
				User, Youth (16-20 yr)	4.1
				User, Youth (11-15 yr)	4.5
<i>Moderate Intensity User</i>	50 <sup>th</sup> (15)	Mean (95)	50 <sup>th</sup> (134.54)	User, Adult (≥21 yr)	37
				User, Youth (16-20 yr)	35
				User, Youth (11-15 yr)	38
<i>High Intensity User</i>	95 <sup>th</sup> (120)	Max (100)	95 <sup>th</sup> (1324.74)	User, Adult (≥21 yr)	312
				User, Youth (16-20 yr)	292
				User, Youth (11-15 yr)	319

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Confidence in the selected model and default parameters is high for inhalation exposure during use of liquid wax polishes for metal and stone. The selected model underwent peer review, was designed explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in the selected inhalation emission scenario is high, as there was a good match in CEM. The utility room was selected as the room of use for this scenario. While it is also reasonable to assume that marble polish may be used in the kitchen, the room volumes are similar and air exchange rates identical, resulting in similar user inhalation exposure. However, a difference may occur for the bystander inhalation exposure when considering utility room use versus kitchen use, based on bystander activity patterns. For example, amount of time the bystander spends in the kitchen is greater than time spent in the utility room, resulting in a lower bystander inhalation exposure for the utility room scenario. If the product was used in the kitchen, the bystander inhalation exposure would be greater than estimated, up to the air concentration experienced by the user. Confidence in the selected model is medium for dermal exposure during use of liquid wax polishes for metal and stone. CEM's permeability model assumes limited evaporation, which is appropriate for marble polish considering the common use of solvent soaked rags when using marble cleaning products. However, if consumers used this product in such a way that evaporation was not impeded, then the selected model would be an overestimate of dermal exposure. Confidence in dermal model default parameters is high due to the high quality of source data. Confidence in the weight fraction is high as this information was pulled directly from product safety data sheets (SDSs). Confidence in mass used and duration of use data is high due to a good match in the Westat survey data, which received a high quality rating during data evaluation and has been applied in



5565 previous agency assessments. The overall confidence in the liquid wax polishes for metal and stone user  
5566 inhalation exposure estimations is high, with possible underestimation of bystander inhalation exposures  
5567 if the room of use changed. The overall confidence in the liquid wax polishes for metal and stone dermal  
5568 exposure estimations is medium with possible overestimation of dermal exposures in use scenarios  
5569 where chemical evaporation from the hands is not impeded.  
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#### 5571 **2.4.2.3.15 Consumer Product Exposure Summary**

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5572 Consumer exposure to PCE due to use of PCE-containing products was evaluated for 15 product  
5573 scenarios. A modeling approach was taken, based heavily on empirical and survey data, to estimate  
5574 dermal and inhalation exposures. Ideally, consumer product exposure estimates would be compared to  
5575 monitoring data for product use, however such monitoring data was not available in the literature. Air  
5576 monitoring data for PCE were collected as background indoor air concentrations, i.e. not during product  
5577 use. The North American residential background indoor maximum concentration was  $0.17 \text{ mg/m}^3$ , with  
5578 central tendencies at or below  $0.028 \text{ mg/m}^3$ . Modeling estimates represent exposure during active  
5579 product use and immediately after. The “moderate intensity user” estimates returned maximum 24-hour  
5580 TWA indoor air concentrations for product users between  $0.0097$  and  $166 \text{ mg/m}^3$  and bystander  
5581 maximum 24-hour TWA indoor air concentrations between  $0.009$  and  $32.2 \text{ mg/m}^3$ . These estimated  
5582 central values are in some instances below monitored central tendency background levels of PCE in  
5583 residential air. Estimated central values for users and bystanders exceed the maximum monitored  
5584 background concentration by three and two orders of magnitude, respectively, which is reasonable for  
5585 direct product contact.

#### 5586 **2.4.2.4 Consumer Article Exposure Scenarios**

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##### 5587 **2.4.2.4.1 Literature Summary**

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5588 PCE is a common dry cleaning solvent used to clean a wide variety of clothing and fabrics. Residual  
5589 solvent is emitted from cleaned fabrics during transportation, storage and wear; and the introduction of  
5590 dry cleaned articles into residences has been shown to increase indoor PCE. EPA identified  
5591 concentrations of PCE in residential indoor air, personal air, and exhaled breath due to the controlled  
5592 and monitored introduction of freshly dry cleaned garments in residential homes and apartments (results  
5593 summarized in Table 2-88). These studies were conducted in the United States, China, and Japan,  
5594 between 1980 and 1996. In all studies, the dry cleaned garments were placed in the bedroom closet, hall  
5595 closet, or dresser drawer. Following introduction of the dry cleaned clothes, reported concentrations of  
5596 PCE in the indoor air (excluding the storage closet or drawer) ranged from  $0.93$  to  $692 \text{ } \mu\text{g/m}^3$ . The  
5597 maximum concentration was from a US study ([Howie 1981](#)), conducted in a rural residential area  
5598 outside of Washington DC) in which samples were collected from a closed bedroom after freshly dry  
5599 cleaned garments were placed in the bedroom closet. Two other US studies reported slightly lower  
5600 maximum concentrations, including  $297 \text{ } \mu\text{g/m}^3$  in an experiment conducted in nine homes in NJ by  
5601 Thomas ([1991](#)) and  $195 \text{ } \mu\text{g/m}^3$  in a series of experiments conducted in one test house by Tichenor  
5602 ([1990](#)). The data in Thomas ([1991](#)) showed that PCE levels can increase after bringing freshly dry  
5603 cleaned clothes into the home (seven of the nine test homes showed PCE concentrations increases). This  
5604 study includes a calculated source strength at four homes and determined that sources of PCE outside  
5605 the house were not responsible for observed concentration increases after introduction of dry cleaned  
5606 clothing. Personal air concentrations of PCE were higher when test subjects spent more time in the  
5607 home, and wearing dry cleaned garments was a less important predictor of personal air concentration  
5608 than the number of garments per home volume and number of hours spent in the home. The Tichenor  
5609 ([1990](#)) study investigated concentrations over a seven-day period for multiple scenarios: storing clothes

5610 with and without a plastic bag cover, and “airing out” the clothes before bringing them inside. A wide  
5611 variation of concentrations was observed in this study. All the experiments, however, showed that PCE  
5612 concentrations increased with the introduction of dry cleaned clothes, and levels dropped to near or  
5613 below the detection limit after the clothes were removed. The authors also concluded that “airing out” of  
5614 the clothing for short time periods does not reduce emissions. Concurrent to measuring concentrations in  
5615 a test house, a chamber study was conducted, and modeled concentrations were calculated based on  
5616 empirical data. Modeled concentrations were similar to measured concentration, reaching a maximum of  
5617 approximately  $100 \mu\text{g}/\text{m}^3$ . In the storage location within the homes, the maximum concentration (daily  
5618 average) observed in this dataset was  $2,900 \mu\text{g}/\text{m}^3$ , as reported by Tichenor ([1990](#)).

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5620 In addition to homes, a German study ([Gulyas and Hemmerling 1990](#)) investigated the concentration of  
5621 PCE in a car after driving with a freshly dry cleaned down jacket placed in the car. Prior to introduction,  
5622 the concentration inside the car was the same as background ambient concentrations ( $1$  to  $2 \mu\text{g}/\text{m}^3$ ).  
5623 Concentrations increased to a maximum  $24,800 \mu\text{g}/\text{m}^3$  at 108 minutes after article introduction. Another  
5624 study, Park ([1998](#)), predicted PCE concentration in a car containing freshly dry cleaned clothes, using  
5625 the EPA Indoor Air Quality model set to simulate driving a car. The model used emission data from  
5626 Tichenor ([1990](#)) (initial emission rate of  $1.2 \text{ mg}\cdot\text{m}^2\cdot\text{hr}^{-1}$  and first order rate constant of  $3.3 \times 10^{-2} \text{ hr}^{-1}$ )  
5627 combined with air exchange rates experimentally determined in the study (1 per hour while stopped or  
5628 10 per hour while driving). Concentrations peaked at  $2,300 \mu\text{g}/\text{m}^3$  which occurred at the end of a 30-  
5629 minute stopped/parking period.

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**Table 2-88 Concentrations ( $\mu\text{g}/\text{m}^3$ ) of PCE in indoor air, personal breathing zones, and breath from exposure studies with dry cleaned textiles placed in the home or automobile**

Study Info	Media Type	Site Description	Detection Limit	Sample Size	DF	Min.	Mean	Max.	Data Evaluation Score
<b>Residential Homes</b>									
(Chao et al. 1999) <sup>a</sup> CN, 1996	24-hr (indoor air)	Hong Kong, CN; Residential Home (Site A) with dry cleaned clothes in closet. Four tests (each 7 days) in urban 5th floor apartment bedroom. Windows open and no AC unit.	--	28	1	4.6	--	76	Medium
		Hong Kong, CN; Residential Home (Site B) with dry cleaned clothes in closet. Four tests (each 7 days) in suburban 2nd floor apartment bedroom. Windows never opened and AC occasionally on.	--	28	1	21	--	494	Medium
		Hong Kong, CN; Residential Home (Site C) with dry cleaned clothes in closet. Four tests (each 7 days) in urban 10th floor apartment bedroom. Windows closed when AC on and windows open when AC off.	--	28	1	0.93	--	100	Medium
(Thomas et al. 1991) <sup>b</sup> US	12-hr (indoor air)	Bayonne and Elizabeth, NJ; Living rooms and bedrooms of nine homes. Six to ten 12-hr sampling periods per home. Two to ten sets of dry cleaned clothes were brought into the homes during the third monitoring period and stored based on the participants normal procedures. A resident wore a set of dry cleaned clothes during a later period. Number of maximum observations = 18.	--	--	--	--	--	8 - 297 (mean of max = 96 $\pm$ 88)	High
	12-hr (personal air)	Bayonne and Elizabeth, NJ; Six to ten 12-hr sampling periods per home. Two to ten sets of dry cleaned clothes were brought into the homes during the third monitoring period and stored based on the participants normal procedures. The resident monitored wore a set of dry cleaned clothes during a later period. Number of maximum observations = 7.	1	--	--	--	--	8 - 303 (mean of max = 127 $\pm$ 108)	High
	n/a (exhaled breath)	Bayonne and Elizabeth, NJ; Six to ten 12-hr sampling periods per home. Two to ten sets of dry cleaned clothes were brought into the homes during the third monitoring period and stored based on the participants normal procedures. A	--	--	--	--	--	9 - 61 (mean of max = 27 $\pm$ 20)	High

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Study Info	Media Type	Site Description	Detection Limit	Sample Size	DF	Min.	Mean	Max.	Data Evaluation Score
		breath sample was collected at end of each 12-hr monitoring period. The resident monitored wore a set of dry cleaned clothes during a later period. Number of maximum observations = 9.							
(Tichenor et al. 1990) <sup>c</sup> US	-- (indoor air)	Single story residential house with dry cleaning placed in closet. Closet door was closed and all other doors were open. HVAC fan operated. <b>Samples collected from the closet.</b>	1	--	--	--	100-2,900 (daily avg.) [model est. = 200-1,000]	--	High
		Single story residential house with dry cleaning placed in closet. Closet door was closed and all other doors were open. HVAC fan operated. <b>Samples collected from the bedroom.</b>	1	--	--	--	20-195 (daily avg.) [model est. = 30-100]	--	High
		Single story residential house with dry cleaning placed in closet. Closet door was closed and all other doors were open. HVAC fan operated. <b>Samples collected from the den.</b>	1	--	--	--	10-80 (daily avg.) [model est. = 15-50]	--	High
(Kawauchi and Nishiyama 1989) <sup>d</sup> JP	2-hr (indoor air)	Consumer homes in Japan (n=4). Dry cleaned clothes placed in chest of drawers. Samples collected from 2 to 4 pm during the weekday <b>inside chest of drawers.</b>	--	9	1	2.9	--	326.6	Medium
		Consumer homes in Japan (n=4). Dry cleaned clothes placed in chest of drawers. Room air samples collected from 2 to 4 pm during the weekday in <b>same room as chest of drawers.</b>	--	6	1	1.3	--	7.4	Medium
(Howie 1981) <sup>e</sup> US, 1980	24-hr (indoor air)	Washington, D.C., in late summer; Private home in rural residential area. Samples collected over 7 days after placing dry cleaned clothing in the house.	--	7	1	42.0	--	692	High
<b>Automobiles</b>									
(Gulyas and Hemmerling 1990) Germany, 1990		Vehicle with a dry cleaned down jacket placed in the car.	--	3	1	9,300	--	24,800	
(Park et al. 1998)	n/a	Modeled air concentration in vehicle with dry cleaned jacket. Assumptions: Volume = 3.24 m <sup>3</sup> ; surface area of jacket = 3.32 m <sup>2</sup> ; initial emission rate of 1.2 mg/m <sup>2</sup> /hr and first order rate constant of 3.3 x 10 <sup>-2</sup> /hr (from Tichenor et al., 1990);	n/a	n/a	n/a	--	--	2,300	High

Study Info	Media Type	Site Description	Detection Limit	Sample Size	DF	Min.	Mean	Max.	Data Evaluation Score
		AER of 1/hr while stopped or 10/hr while driving							

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Study Info: The information provided includes the HERO ID and citation; country and year samples collected.

Abbreviations: If a value was not reported, it is shown in this table as "--". ND = not detected at the reported detection limit. DF = detection frequency. NR = Not reported. CN = China. US = United States. JP = Japan. AC = air -conditioning.

Parameters: All statistics are shown as reported in the study.

<sup>a</sup> Results from this study ([Chao et al. 1999](#)) represent four tests at each of three test sites. Test 1: male clothes kept inside dry cleaner’s original plastic bags. Test 2: male clothes kept outside dry cleaner’s plastic bag. Test 3: male and female clothes kept inside drycleaner’s plastic bags. Test 4: male and female clothes kept outside dry cleaner’s plastic bags. Site A: min from Test 2 Day 7 and max from Test 4 Day 2. Site B: min from Test 1 Day 7 and max from Test 4 Day 1. Site C: min from Test 1 Day 2 and max from Test 4 Day 1.

<sup>b</sup> Results from this study ([Thomas et al. 1991](#)) represent a summary of the maximum indoor air, personal air, and breath concentrations measured at nine homes after introduction of dry cleaned clothes. Individual concentration values were not reported in the study. Indoor air (living area/bedroom): min from bedroom and max from living room. Concentrations before introduction of dry cleaned clothes were also measured for two 12-hr periods. Maximum concentrations ranged from 5 to 64 µg/m<sup>3</sup> in living room or bedroom, 8 to 35 µg/m<sup>3</sup> in personal air, and 3 to 30 µg/m<sup>3</sup> in breath.

<sup>c</sup> Results from this study ([Tichenor et al. 1990](#))<sup>c</sup> represent a summary of daily average indoor air concentrations from a closet (with dry cleaned clothes), bedroom and den inside a residential home over seven days. The study provided the results (in graph form) for four tests performed during each day of sampling: (1) bag off; (2) bag on; (3) aired out; and (4) repeat of bag off. Closet: min from Test 1 Day 7 and max from Test 3 Day 1. Bedroom: min from Test 1 Day 7 and max from Test 3 Day 1. Den: min from Test 1 Day 7 and max from Test 3 Day 2. Model estimates were calculated using a source term based on small chamber data

<sup>d</sup> Results from this study ([Kawauchi and Nishiyama 1989](#)) represent indoor air concentrations from a chest of drawers and a bedroom in four homes.

<sup>e</sup> Results from this study ([Howie 1981](#)) represent measured indoor air concentrations over a 7 day period (24-hr samples).

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5652 Inhalation exposure to PCE in indoor air due to emissions from storage of dry cleaned articles was  
5653 assessed for consumer users and bystanders, using measurements of PCE emissions from fabrics cleaned  
5654 with older dry cleaning technologies (2<sup>nd</sup> and 3<sup>rd</sup> generation) as a worst-case emission scenario. Dermal  
5655 exposure due to direct skin contact with recently dry cleaned fabrics during article wear was assessed for  
5656 consumer users, for older and more modern dry cleaning technologies (2<sup>nd</sup>-5<sup>th</sup> generation). Preliminary  
5657 estimations of inhalation exposure to PCE emissions during article wear was found to be much lower  
5658 than either the storage or dermal exposure scenarios and was not further pursued. Dry cleaning  
5659 consumer exposures could be cumulative for the user, including inhalation exposure during transport of  
5660 dry cleaned articles in an automobile, inhalation exposure from dry cleaned articles stored in the home,  
5661 and inhalation and dermal exposure from wearing dry cleaned articles.

#### 5662 **Modeling Approach**

5663 Dermal exposure to PCE resulting from direct skin contact with recently dry cleaned articles, i.e.  
5664 wearing dry cleaned clothing, was modeled with CEM. Inhalation exposure to PCE emitted from  
5665 recently dry cleaned articles stored in a home was modeled using EPA's Multi-Chamber Concentration  
5666 and Exposure Model (MCCEM). MCCEM is a higher tier model and utilizes chemical-specific  
5667 emissions data to estimate air concentrations and inhalation exposure.  
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#### 5670 **2.4.2.4.2 Dermal Exposure to Recently Dry cleaned Articles**

5671 EPA's CEM 2.1 dermal sub-model A\_DER2: Dermal Dose from Skin Contact with Article, as presented  
5672 in the CEM user guide ([U.S. EPA 2019b](#)) was used to model dermal exposure to PCE from direct  
5673 contact with recently dry cleaned articles. This model calculates dermal exposure due to migration of a  
5674 chemical within an article to the skin via direct article contact.  
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#### 5676 **Residual Mass**

5677 Residual mass of PCE remaining in recently in dry cleaned articles can be thought of as the chemical  
5678 "pool", or the amount of chemical potentially available for dermal exposure. Residual PCE mass was  
5679 calculated from two sources (see Section 2.4.2.4.2) The first data source, based on Tichenor ([1990](#))  
5680 applies to 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> generation dry cleaning machines, due to the date the study was conducted<sup>14</sup>.  
5681 Tichenor ([1990](#)) conducted chamber tests and test house studies to measure emission rates and emission  
5682 half-lives of PCE from various commercially dry cleaned fabrics. Residual PCE was calculated using a  
5683 simple exponential model based on measured PCE emissions. The second data source, based on  
5684 Sherlach ([2011](#)), likely applies to 4<sup>th</sup> and 5<sup>th</sup> generation dry cleaning machines, due to the date the study  
5685 was conducted. Sherlach ([2011](#)) extracted perchloroethylene residues from commercially dry cleaned  
5686 fabrics after a single cleaning event, multiple cleaning events, and after one week of storage. Cotton,  
5687 Polyester and wool fabric were shown to accumulate PCE with subsequent dry cleaning cycles. Multiple  
5688 dry cleaning cycle estimates were included to model a high-end user (albeit using more modern  
5689 commercial dry cleaners) who has their wool suit dry cleaned weekly, such that residual PCE

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<sup>14</sup> Perchloroethylene related NESHAPs from 1993 and 2006 banned 1<sup>st</sup> generation machine and required more modern technologies for new dry cleaning machines but allowed certain 2<sup>nd</sup> and 3<sup>rd</sup> generation machines to continue to be used. Given the age of 2<sup>nd</sup> generation dry cleaning technology, it is likely that only a very small number of these machines are still in use today, but EPA cannot definitively rule out the possibility of their continued use. Similarly, an unknown but likely small number of 3<sup>rd</sup> generation dry cleaning machines may still be in use.

concentrations become saturated in the fabric (Sherlach (2011) showed that wool continued to accumulate PCE for at least 6 cleaning cycles). Residual PCE was calculated using reported residual concentration data and a simple emission model. Residual mass of PCE in dry cleaned fabrics was calculated for the first three days after the dry cleaning event<sup>15</sup>. Details of the calculation can be found in the *Draft Risk Evaluation for Perchloroethylene Supplemental Information for Consumer Exposure* (U.S. EPA 2020f).

**Table 2-89. Cumulative mass released for number of days post dry cleaning and number of hours the garment was worn (10 hr), based on Tichenor (1990) and Sherlach (2011). Values were used as modeling inputs for the residual pool of PCE available for exposure.**

Data Source (est. machine generation)	Fabric Type	Dry cleaning events	Average Residual Mass (mg)		
			Time since article was dry cleaned		
			1 day	2 days	3 days
Tichenor (1990) (1 <sup>st</sup> -3 <sup>rd</sup> )	Polyester-wool blend	Single	105	81	63
Sherlach (2011)	Polyester <sup>1</sup>	Single	18	14	11
Sherlach (2011)	Wool <sup>2</sup>	Repeat <sup>3</sup>	58	45	35

<sup>1</sup> Based on average maximum measured PCE concentration in polyester fabric samples after single cleaning event

<sup>2</sup> Based on average maximum measured PCE concentration in wool fabric samples after multiple cleaning events

<sup>3</sup> Residual value used to parameterize model is based on 6<sup>th</sup> cycle data for wool from Sherlach (2011))

Factors affecting the value of residual mass include fabric type, number and proximity of dry cleaning events, total number of dry cleaned articles, total article surface area, the type (generation) of dry cleaning machine used and number of days elapsed since the fabric was dry cleaned. Different fabrics retain different amounts of PCE, the values estimated here are based on measured emissions from a variety of fabrics reported in Tichenor (1990) and Sherlach (2011).

### Dry cleaned article parameters

An article with a surface area of 1m<sup>2</sup> and 1.5m<sup>2</sup> was assumed to calculate residual mass, with a wearer donning the garment(s) 1 to 3 days after dry cleaning, for a total duration of 10 hours (assumption of 8-hour work day, plus commute). An average fabric thickness of 0.1 cm was assumed based on the fabrics used in the Tichenor (1990) and Sherlach (2011) studies and thickness measurements of various types of fabrics (based on Küçük and Korkmaz (2012); Marolleau (2017); Van Amber (2010). Thickness of fabric is inversely proportional to dermal dose (as thinner fabrics require less diffusion distance to reach skin). A single, multi-hour contact per day was assumed for acute exposure.

### CEM Dermal Results

<sup>15</sup> Measured PCE emissions from recently dry-cleaned fabrics were fit to a simple exponential model to describe the rate of emission, and thus calculate the residual mass of PCE remaining in the fabric at a certain time after the dry cleaning event. Residuals were calculated for days 1-3 post-cleaning, as 3 days was roughly one half-life in the fitted decay curve. A consumer that wore a garment more than three days after dry cleaning would have less potential dermal PCE exposure, although elevated air concentrations in the home and inhalation exposures would remain unchanged.

5720 Dermal exposure to PCE due to direct contact with recently dry cleaned articles was evaluated for 1-3  
 5721 days after dry cleaning, assuming different dry cleaning technologies and for four article thickness  
 5722 values, for both half-body (1 article) and full body (2 articles) exposure (Table 2-90). ADR results for  
 5723 half-body exposure ranged from 5.1E-02 to 0.5 mg·kg<sup>-1</sup>·day<sup>-1</sup>. ADR results for full-body exposure  
 5724 ranged from 0.2 to 1.5 mg·kg<sup>-1</sup>·day<sup>-1</sup>.  
 5725  
 5726

**Table 2-90. Dermal exposure results to recently dry cleaned articles, based on CEM modeling**

Assumed dry cleaning technology	Dry Cleaning Events	Days After Dry Cleaning	Half-body Dermal ADR (Surface Area 1 m <sup>2</sup> , SABW 122.9) mg/kg-day	Full-body Dermal ADR (Surface Area 1.5 m <sup>2</sup> , SABW 245.9) mg/kg-day
2 <sup>nd</sup> and 3 <sup>rd</sup> generation	Single	1	0.5	1.5
		2	0.3	1.1
		3	0.3	0.9
4 <sup>th</sup> and 5 <sup>th</sup> generation	Single	1	8.7E-02	0.3
		2	6.7E-02	0.2
		3	5.1E-02	0.2
4 <sup>th</sup> and 5 <sup>th</sup> generation	Repeat <sup>1</sup>	1	0.3	0.8
		2	0.2	0.6
		3	0.2	0.5

5727 <sup>1</sup> Based on maximum average PCE concentration in wool after 6 dry cleaning cycles from Sherlach (2011); PCE  
 5728 concentration was still increasing in wool fabric after 6 cycles and had not yet reached saturation.  
 5729

5730 Confidence in the selected model and default parameters is medium to high for dermal exposure due to  
 5731 wearing recently dry cleaned articles. The selected model underwent peer review, was designed  
 5732 explicitly for the purpose of this type of estimation and applied in the manner intended. Confidence in  
 5733 dermal model default parameters is high due to the high quality of source data. Residual PCE remaining  
 5734 in dry cleaned clothing was determined from high quality test chamber emission data from early  
 5735 generation dry cleaning machines (dates from 1990), and high-quality analytical data on PCE residuals  
 5736 from more modern dry cleaning technologies, which leave less residual PCE in dry cleaned fabrics.  
 5737 CEM's article diffusion model is sensitive to the thickness of material selected. An effort was made to  
 5738 best match the fabric type and assumed article thickness of the Tichenor (1990) and Sherlach (2011) test  
 5739 swatches to minimize over- or underestimating residual PCE. The quantity of residual PCE in articles  
 5740 varies based on fabric type and how much time has elapsed between subsequent dry cleaning events.  
 5741 Dermal exposure results may differ for other types of fabrics. The overall confidence in dermal exposure  
 5742 estimations due to wearing recently dry cleaned articles is medium to high with possible overestimation  
 5743 or underestimation based on differences in PCE retention in various fabric types and frequency of dry  
 5744 cleaning events.  
 5745



#### 2.4.2.4.3 Inhalation Exposure to Recently Dry cleaned Articles

##### MCCEM Modeling Approach

Inhalation exposure due to emissions of PCE from recently dry cleaned clothing was modeled using EPA's Multi-Chamber Concentration and Exposure Model (MCCEM, ([U.S. EPA 2019e](#))) single-exponential emission model and emissions data available in published literature.

Tichenor ([1990](#)) measured PCE air concentrations due to emissions from recently dry cleaned articles in a test house (EPA's Air and Energy Engineering Research Laboratory, Indoor Air Quality test home). It is assumed, given the date of the study, that results likely reflect commercial cleaners using 2<sup>nd</sup> or 3<sup>rd</sup> generation dry cleaning machines. Newer technologies are presumed to result in lower residual PCE concentrations in dry cleaned fabrics, but EPA cannot definitely say that older model machines have been completely replaced with 4<sup>th</sup> generation (or later) technologies. As such, Tichenor ([1990](#)) was used for model parameterization as a high end estimate, and based on risk results (see Section 4.2.4.16), further modeling for 4<sup>th</sup> and 5<sup>th</sup> generation technologies was not done. Test house measurements were conducted by placing freshly dry cleaned garments (wool skirt, two polyester/ rayon blouses and a two-piece wool-blend suit) in a bedroom closet. Indoor air samples were collected at three locations (closet, bedroom, and den), four times a day.

EPA used this data as a modeling basis to parameterize the MCCEM indoor air model for a generic residential house (Table 2-91). The EPA/Tichenor test house layout, along with reported house volume and whole-house air exchange rate ([Chang et al. 1998](#); [Tichenor et al. 1990](#)) were used as the basis for a generic home. EPA assumed the zone of use to be a bedroom closet containing dry cleaned articles, defined as the near-field volume. The bedroom containing the closet was defined as the far-field volume. The third zone was termed the "rest of the house" (ROH) and included all areas outside of the bedroom. A user in this scenario was assumed to be a person who places dry cleaned articles in their bedroom closet and spends some short amount of time dressing in that closet, twice per day. The CEM activity pattern for a stay-at-home adult was selected as the basis for an MCCEM adult "user" pattern, with an addition of 5 minutes spent in the closet (near-field) in the morning and in the evening. A bystander in this scenario was considered to be a youth or child that remained in the rest of the house. PCE air concentrations were modeled over a ten-day period. Further details of the MCCEM model parameterization are given in the *Draft Risk Evaluation for Perchloroethylene Supplemental Information for Consumer Exposure* ([U.S. EPA 2020f](#)).

**Table 2-91. Emission parameters for MCCEM modeling of PCE emissions from recently dry cleaned clothing.**

Parameter Name	Value	Source
First order decay rate	0.011 hr <sup>-1</sup>	Scaled from Tichenor ( <a href="#">Tichenor et al. 1990</a> )
Emission rate	7.38 mg/hr	Scaled from Tichenor ( <a href="#">Tichenor et al. 1990</a> )
Article surface area <sup>1</sup>	12.6 m <sup>2</sup>	Scaled from Tichenor ( <a href="#">Tichenor et al. 1990</a> )
MCCEM model house volume	446 m <sup>3</sup>	Scaled from Chang ( <a href="#">1998</a> )
Closet volume (near-field)	5 m <sup>3</sup>	Scaled from Chang, ( <a href="#">1998</a> )

Parameter Name	Value	Source
Near-field: far-field air flow rate	8 m <sup>3</sup> /hr	Scaled from Chang, (1998)
Whole house air exchange rate	0.45 hr <sup>-1</sup>	CEM v2.1 default <sup>2</sup>
Length of run	240 hr (10 days)	EPA choice
Background concentration	0 mg/m <sup>3</sup>	EPA choice

5781 <sup>1</sup>An article surface area of 12.6 m<sup>2</sup> corresponds to roughly seven articles of adult clothing

5782 <sup>2</sup>EPA's Consumer Exposure Model version 2.0 (2017a)

5783

5784 **MCCEM Inhalation Results**

5785 Peak PCE air concentrations and maximum 24-hour TWAs for the dry cleaned article storage scenario  
 5786 are summarized in Table 2-92 and Table 2-93. Maximum PCE air concentrations occurred in the closet  
 5787 roughly 4 hours after placement of clothing (9.67x10<sup>-1</sup> mg/m<sup>3</sup>). Air concentrations in the surrounding  
 5788 bedroom peaked roughly 7 hours after clothing placement (8.72x10<sup>-2</sup> mg/m<sup>3</sup>), and 10 hours after  
 5789 placement for the rest of the house (2.98x10<sup>-2</sup> mg/m<sup>3</sup>). The maximum 24-hour TWA PCE air  
 5790 concentrations were 7.24x10<sup>-2</sup> mg/m<sup>3</sup> for the user and 2.33x10<sup>-2</sup> mg/m<sup>3</sup> for the bystander. Indoor air  
 5791 concentrations of PCE remained elevated above pre-exposure levels for the duration of the 10-day  
 5792 modeling window.

5793

5794 **Table 2-92. MCEEM calculated PCE air concentrations for storage of recently dry cleaned**  
 5795 **articles in a generic house.**

Zone	Maximum Concentration (mg/m <sup>3</sup> )	Time Elapsed at Maximum (hr)	Hour 10 Concentration (mg/m <sup>3</sup> )
Closet (near-field)	9.7E-01	3.85	7.3E-02
Bedroom (far-field)	8.7E-02	7.27	6.9E-03
ROH	3.0E-02	9.62	2.4E-03

5796

5797 **Table 2-93. MCEEM calculated PCE maximum 24-hour TWAs for storage of recently dry cleaned**  
 5798 **articles in a generic house.**

Exposure Receptor	Maximum 24-hour TWA Concentration (mg/m <sup>3</sup> )
User (stay-at-home adult)	7.2E-02
Bystander (stay-at-home child or youth)	2.3E-02

5799

5800 Confidence in the selected model and default parameters is medium to high for inhalation exposure  
 5801 during storage of recently dry cleaned articles in a home closet. Estimated exposures represent a higher-  
 5802 end scenario where articles have been cleaned at a commercial dry cleaner still employing older  
 5803 technology. The selected model underwent peer review, was designed explicitly for the purpose of this  
 5804 type of estimation and applied in the manner intended. Confidence in the parameterization of the

5805 inhalation emission scenario is high, as there was a high-quality test chamber emission data and test  
5806 house monitoring data available, however the total number of studies was limited. The master bedroom  
5807 room was selected as the room of use for this scenario. This may underestimate bystander inhalation  
5808 exposure, based on activity patterns, relative to storage of dry cleaned articles in a common area of the  
5809 house. Residual PCE remaining in dry cleaned clothing was determined from high quality test chamber  
5810 emission data, using emissions parameters based on older (2<sup>nd</sup> and 3<sup>rd</sup> generation) dry cleaning  
5811 technologies. More modern dry cleaning technologies presumably leave less residual PCE in dry cleaned  
5812 fabrics. Based on risk results (see Section 4.2.4.16), further modeling for more modern dry cleaning  
5813 technologies was unnecessary. The quantity of residual PCE in articles varies based on fabric type and  
5814 how much time has elapsed between subsequent dry cleaning events. Inhalation exposure results may  
5815 differ for other types of fabrics, for more or less frequently dry cleaned articles and based on the number  
5816 of dry cleaned items stored. The overall confidence in inhalation exposure estimations due to storage of  
5817 recently dry cleaned articles in a home is medium to high with possible overestimation based on the  
5818 availability of more modern dry cleaning technologies, and possible overestimation or underestimation  
5819 based on differences in PCE retention in various fabric types, frequency of dry cleaning events and  
5820 number of dry cleaned items stored.

#### 5821 **2.4.2.4.4 Consumer Article Exposure Summary**

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5822 Consumer exposure to PCE due to off-gassing from recently dry cleaned articles was evaluated for two  
5823 scenarios, direct dermal contact with clothing, and inhalation exposure from article storage in a home  
5824 closet. A modeling approach was taken, based heavily on empirical data, to estimate dermal and  
5825 inhalation exposures. No direct measurements were found for consumer dermal exposure to PCE from  
5826 dry cleaned fabrics. Dermal exposure estimates ranged from 5.1E-02 to 1.5 mg/kg/day. Measurements  
5827 of PCE concentrations in indoor air from storage of recently dry cleaned articles are in good agreement  
5828 with modeling results. Elevated PCE concentrations measured in bedroom air, shortly after dry cleaned  
5829 articles were stored in a dresser or closet, were reported as between 9.3E-03 and 0.7 mg/m<sup>3</sup>, with  
5830 modeling estimates for maximum PCE air concentration in the bedroom after article storage of 8.7E-02  
5831 mg/m<sup>3</sup>. Dry cleaning consumer exposures could be cumulative for the user, including inhalation  
5832 exposure during transport of dry cleaned articles in an automobile, inhalation exposure from dry cleaned  
5833 articles stored in the home, and inhalation and dermal exposure from wearing dry cleaned articles.  
5834

#### 5835 **2.4.2.5 Other Consumer Uses**

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5836 Additional potential consumer exposures to PCE were identified, including off-gassing from new  
5837 clothing and apparel, due to use of PCE in the textile industry; use of coin operated dry cleaning  
5838 machines; and emissions from photocopy and printing equipment. Available data is summarized below.  
5839 Due to limited available information on these conditions of use, risk for these scenarios will not be  
5840 further assessed.

#### 5841 **2.4.2.5.1 New Clothing/Textile Industry**

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5842 PCE is used to remove spinning oils, lubricants and naturally occurring dirt and oils from yarn and  
5843 fabric used in clothing manufacturing, and as a carrier solvent for dyes in the textile industry ([Morrison  
5844 and Murphy 2013](#)). While a high percentage of PCE applied to textiles during manufacturing is expected  
5845 to volatilize, there is potential for consumer exposure due to off-gassing from new textiles and fabrics. Chan  
5846 ([2014](#)) measured PCE in indoor air in apparel stores, with a detection frequency of 30% (120 samples),  
5847 and reported mean air concentration of 0.2 µg/m<sup>3</sup>.

5848

#### 2.4.2.5.2 Coin Operated Dry Cleaners

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5849 Howie (1981) measured indoor air PCE concentrations in coin-operated dry cleaning facilities in the  
5850 United States (6 facilities). PCE was detected in 100% of collected samples, with air concentration range  
5851 from 508 to 94984  $\mu\text{g}/\text{m}^3$ . EPA was not able to determine if coin operated dry cleaning machines were  
5852 still in use in the United States.

5853

#### 2.4.2.5.3 Print Shops

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5854 Stefaniak (2000) measured PCE in area and personal breathing zone air samples, in three commercial  
5855 print shops in Baltimore, MD. A total of 17 area samples and 4 personal breathing zone samples were  
5856 collected, with detection frequencies of 94% and 100%, respectively. PCE concentrations in personal  
5857 breathing zone samples ranged from 0.7 to 3.4  $\mu\text{g}/\text{m}^3$ , and in area samples from non-detection to 21  
5858  $\mu\text{g}/\text{m}^3$ .

5859

5860 Ryan (2002) measured PCE in indoor air in a printmaking art studio in a university building in the  
5861 United States. 18 samples were collected, with reported PCE concentration mean of 0.4  $\mu\text{g}/\text{m}^3$ .

5862

5863 Kiurski (2016) measured elevated PCE levels in a small commercial photocopy shop in Serbia,  
5864 containing two copiers and a printer. PCE concentrations were attributed to the usage of photocopying  
5865 equipment. A total of 225 samples were collected, with a PCE detection frequency of 64%, and  
5866 measured concentration range of 6.8 to 96341  $\mu\text{g}/\text{m}^3$ .

5867

5868 Kowalska and Gierczak (2013) measured volatile emissions from disintegrated office equipment (11  
5869 items). PCE was detected most frequently in office equipment samples, with 68.7% detection.

5870

#### 2.4.2.6 Consumer Exposure Assumptions and Key Sources of Uncertainty

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5871 Overall, there is medium to high or high confidence in the consumer inhalation exposure modeling  
5872 approach and results. This is based on the strength of the model employed, as well as the quality and  
5873 relevance of the default, user-selected and varied modeling inputs. CEM 2.1 (U.S. EPA 2019b) is a peer  
5874 reviewed, publicly available model that was designed to estimate inhalation and dermal exposures from  
5875 household products and articles. CEM uses central-tendency default values for sensitive inputs such as  
5876 building and room volumes, interzonal ventilation rate, and air exchange rates. These parameters were  
5877 not varied by EPA due to EPA having greater confidence in the central tendency inputs for such factors  
5878 that are outside of a user's control (unlike, e.g., mass of product used or use duration). These central  
5879 tendency defaults are sourced from EPA's Exposure Factors Handbook (U.S. EPA 2011a). The  
5880 confidence in the user-selected varied inputs (i.e., mass used, use duration, and weight fraction) are  
5881 medium to high, depending on the condition of use. The sources of these data are U.S. EPA (1987)  
5882 (high-quality) and company-generated SDSs (see EPAs Preliminary Information on Manufacturing,  
5883 Processing, Distribution, use and Disposal: Tetrachloroethylene (2017f)). What reduces confidence for  
5884 particular conditions of use is the relevance or similarity of the U.S. EPA (1987) survey product  
5885 category for the modeled condition of use. For instance, the evaluated brake cleaner scenario had  
5886 surveyed information directly about this condition of use within U.S. EPA (1987), resulting in a high  
5887 confidence in model default values. In contrast, the parts cleaner scenario did not have an exact match  
5888 within U.S. EPA (1987), resulting in use of a surrogate scenario selected by professional judgement that  
5889 most closely approximates the use amount and duration associated with this condition of use.  
5890 Additionally, in some cases, professional judgment or surveyed information from U.S. EPA (1987) was  
5891 used in selection of room of use, which sets the volume for modeling zone 1.

5892

5893 Dermal exposure modeling results overall were rated as medium or medium to high confidence. The  
5894 processes and inputs described for the inhalation scenarios above are also valid for the dermal exposure  
5895 scenarios. While the model used for product dermal exposure estimates was the same as used for the  
5896 product inhalation exposure estimates, there is overall medium (vs. high for inhalation) confidence in the  
5897 model used due to the used dermal submodel. As described in Section 2.4.2.2.2, the evaluation of dermal  
5898 exposures used a permeability submodel, which ignores evaporation and thus is only applicable to use  
5899 scenarios for which evaporation is limited, such as during immersion or when handling a solvent-soaked  
5900 rag. As a result, model results may overestimate dermal exposure when evaporation is significant, or the  
5901 actual contact volume cannot be modeled using a constant bath assumption. This evaluation assumes  
5902 consumer exposure under each condition of use is not chronic in nature due to the infrequent use and  
5903 short duration of use for a given product. There is a medium uncertainty associated with this assumption  
5904 because, although information found during EPA’s systematic review process supports infrequent use  
5905 and short durations of use, there is a growing consumer practice to complete projects or activities as do  
5906 it yourselves. Do it yourself activities could lead to an increased frequency of product use as well as  
5907 using more than one product containing a chemical of concern within a given day. These and other  
5908 factors associated with do it yourself activities could result in underestimating consumer exposure  
5909 concentrations modeled in this evaluation for the do it yourself consumer.  
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### 5912 **2.4.3 Potentially Exposed or Susceptible Subpopulations**

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5913 TSCA requires the risk evaluation “determine whether a chemical substance presents an unreasonable  
5914 risk of injury to health or the environment, without consideration of cost of other non-risk factors,  
5915 including an unreasonable risk to a potentially exposures of susceptible subpopulation identified as  
5916 relevant to the risk evaluation by the Administrator, under the conditions of use.” TSCA § 3(12) states  
5917 that “the term ‘potentially exposed or susceptible subpopulation’ means a group of individuals within  
5918 the general population identified by the Administrator who, due to either greater susceptibility or greater  
5919 exposure, may be at greater risk than the general population of adverse health effects from exposure to a  
5920 chemical substance or mixture, such as infants, children, pregnant women, workers, or the elderly.”  
5921

5922 During problem formulation ([U.S. EPA 2018d](#)), EPA identified potentially exposed or susceptible  
5923 subpopulations for further analysis during the development and refinement of the life cycle, conceptual  
5924 models, exposure scenarios, and analysis plan. In this section, EPA addresses the potentially exposed or  
5925 susceptible subpopulations identified as relevant based on *greater exposure*. EPA addresses the  
5926 subpopulations identified as relevant based on *greater susceptibility* in Section 3.2.5.2.  
5927

5928 In developing the draft risk evaluation, the EPA analyzed the reasonably available information to  
5929 ascertain whether some human receptor groups may have greater exposure than the general population  
5930 to the hazard posed by PCE. Exposures of PCE would be expected to be higher amongst groups living  
5931 near industrial facilities, groups with PCE containing products in their homes, workers who use PCE as  
5932 part of typical processes, and groups who have higher age and route specific intake rates compared to  
5933 the general population.  
5934

5935 Of the human receptors identified in the previous sections, EPA identifies the following as potentially  
5936 exposed or susceptible subpopulations due to their greater exposure to PCE and considered them in the  
5937 risk evaluation:  
5938

5939 **Workers and Occupational Non-Users (ONUs)**

5940 EPA reviewed monitoring data found in published literature including both personal exposure  
5941 monitoring data (direct exposure) and area monitoring data (indirect exposures) and identified data  
5942 sources that contain measured monitoring data and or/estimated data for the various conditions of use  
5943 (including import and processing of PCE). Exposure estimates were developed for users (males and  
5944 female workers of reproductive age) exposed to PCE as well as non-users or workers exposed to PCE  
5945 indirectly by being in the same work area of the building. Also, adolescents and female workers of  
5946 reproductive age (>16 to less than 50 years old) were also considered as a potentially exposed or  
5947 susceptible subpopulations  
5948

5949 **Consumers/Product Users and Bystanders Associated with Consumer Use**

5950 PCE has been identified as being used in products available to consumers. Section 2.4.2.2 provides an  
5951 overview of exposure pathways considered for the consumer assessment. Furthermore, EPA identified  
5952 consumers and bystanders associated with use of PCE containing consumer products as a potentially  
5953 exposed and susceptible subpopulation due to greater exposure. For example, higher-intensity users (i.e.,  
5954 those using consumer products for longer durations and in greater amounts) were considered and  
5955 evaluated. In addition, consumers are considered to include children and adults over age 11, but  
5956 bystanders in the home exposed via inhalation are considered to include any age group, from infant to  
5957 adult, including pregnant women and/or women of reproductive age. However, only some individuals  
5958 within the general population may use these products. Therefore, those who do use these products are a  
5959 potentially exposed or susceptible subpopulation due to greater exposure. Exposures for these  
5960 subpopulations are considered and/or evaluated in Section 2.4.2.2.  
5961

5962 In developing dermal exposure scenarios, EPA quantified age and sex-specific differences. For PCE,  
5963 exposure scenarios that involve potentially exposed or susceptible subpopulations considered age-  
5964 specific behaviors, activity patterns, and exposure factors unique to those subpopulations. EPA used the  
5965 Exposure Factors Handbook ([U.S. EPA 2011a](#)) to inform body weights, intake rates, and body surface  
5966 areas for children and adults. Distinct dermal exposure estimates are provided for are provided for adults  
5967 (including women of reproductive age) and children (Section 2.4).  
5968

5969 For occupational exposures, EPA assessed exposures to workers and ONUs from all PCE conditions of  
5970 use (Section 2.4.1). Table 2-94 presents the percentage of employed workers and ONUs whom may  
5971 experience either greater exposure or biological susceptibility within select industry sectors relevant to  
5972 PCE conditions of use. The percentages were calculated using Current Population Survey (CPS) data for  
5973 2017 ([U.S. BLS 2017](#)). CPS is a monthly survey of households conducted by the Bureau of Census for  
5974 the Bureau of Labor Statistics and provides a comprehensive body of data on the labor force  
5975 characteristics. Statistics for the following subpopulations of workers and ONUs are provided:  
5976 adolescents, men and women of reproductive age, and the elderly. For the purpose of this assessment,  
5977 EPA considers “reproductive age” as age >16 to less than 50 years old.  
5978

5979 As shown in Table 2-95, men make up the majority of the workforce in manufacturing sectors. In other  
5980 sectors, women (including those of reproductive age and elderly women) make up nearly half of the  
5981 workforce. Adolescents are generally a small part of the total workforce. Table 2-95 presents further  
5982 breakdown on the percentage of employed adolescents by industry subsectors. As shown in the tables,  
5983 they comprise only 1.2% percent of the manufacturing workforce, and only as high as 3.7% for other  
5984 services such as dry cleaning that fall under a COU for PCE.

5985  
5986**Table 2-94. Percentage of Employed Persons by Age, Sex, and Industry Sector**

Age group	Sex	Manufacturing	Wholesale and Retail Trade	Professional and Business Services	Other Services
Adolescent (16-19 years)	Male	0.8%	3.0%	0.7%	1.4%
	Female	0.4%	3.2%	0.5%	1.7%
Reproductive age <sup>a</sup> (16-54 years)	Male	52.9%	42.8%	44.4%	35.2%
	Female	22.2%	35.4%	32.8%	38.4%
Elderly (55+)	Male	17.5%	12.3%	13.4%	13.1%
	Female	7.3%	9.6%	9.4%	13.3%

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<sup>a</sup> The World Health Organization defines women of reproductive age as ages 15-49 ([WHO 2006b](#)) While statistics on pregnant women are not reasonably available, Labor Force Statistics from the Current Population Survey provides data on the number of employed female workers by age group, which allows for determination of the number of employed women of reproductive age. The Bureau of Labor Statistics breaks apart age groups such that age 15 is combined with children, and ages 44-54 are clustered ([U.S. BLS 2017](#)). Percentages were calculated using CPS Table 14, “Employed persons in nonagricultural industries by age, sex, race, and Hispanic or Latino ethnicity”, for ages 16-64.

**Table 2-95. Percentage of Employed Adolescent by Detailed Industry Sector**

Sector	Subsector	Adolescent (16-19 years)
Manufacturing	All	1.2%
Wholesale and retail trade	Wholesale trade	1.4%
Professional and business services	Waste management and remediation services	0.9%
Other services	Repair and maintenance	3.1%
	Dry cleaning and laundry services	3.7%

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Source: ([U.S. BLS 2017](#)). Percentage of adolescent calculated using CPS table 18b, “Employed persons by detailed industry and age.”

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The CPS uses 2012 Census industry classification, which was derived from the 2012 NAICS. The Census classification uses the same basic structure as NAICS but is generally less detailed. PCE conditions of use fall under the following Census industry sectors:

6002

### Manufacturing

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The Manufacturing sector comprises establishments engaged in the mechanical, physical, or chemical transformation of materials, substances, or components into new products. Establishments in the sector are often described as plants, factories, or mills. For PCE, this sector covers most conditions of use that occur in an industrial setting, including: Manufacturing, Processing as a Reactant, Formulation of Aerosol and Non-Aerosol Products, the vast majority of facilities likely engaged in Vapor Degreasing (all degreaser types), Cold Cleaning, Metalworking Fluids, Adhesives, Sealants, Paints and Coatings, Other Industrial Uses, Industrial Processing Aids and Printing and Copying. This sector also covers cement manufacturing facilities that may burn waste containing PCE for energy recovery. Also – Printing and Copying worker information may also be captured under the Information sector (see below).

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**Wholesale and Retail Trade**

The wholesale trade sector comprises establishments engaged in wholesaling merchandise, generally without transformation, and rendering services incidental to the sale of merchandise. Wholesalers normally operate from a warehouse or office. This sector likely covers facilities that are engaged in the repackaging PCE or products and formulations containing PCE. The retail trade sector comprises establishments engaged in retailing merchandise and rendering services incidental to the sale of merchandise.

**Professional and Business Services**

This sector comprises establishments that specialize in a wide range of services. This sector covers waste management and remediation services, which includes establishments that may handle, dispose, treat, and recycle wastes containing PCE.

**Other Services**

This sector comprises establishments engaged in providing services not specifically provided for elsewhere in the classification system. For PCE, this sector covers the vast majority of commercial repair and maintenance facilities that are likely to use PCE for Aerosol Applications (spray degreasing). The sector also covers the use of PCE in dry cleaning.

The EPA IRIS Assessment for PCE ([U.S. EPA 2012c](#)) also identified the developing fetus as potentially exposed, as well as infants consuming breastmilk, particularly for mothers with occupational exposure to PCE or exposure due to proximity to industrial or commercial sources ([U.S. EPA 2012c](#)). Infants fed by formula may also experience increased PCE exposure if PCE is present in drinking water supplies ([U.S. EPA 2012c](#)).



## 6039 **3 HAZARDS**

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### 6040 **3.1 Environmental Hazards**

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#### 6041 **3.1.1 Approach and Methodology**

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6042 EPA reviewed potential environmental health hazards associated with PCE. EPA identified the  
6043 following sources of environmental hazard data for PCE: European Chemicals Bureau (ECB) EU Risk  
6044 Assessment Report Tetrachloroethylene, Part 1 - environment ([ECB 2005](#)) and World Health  
6045 Organization (WHO) Concise International Chemical Assessment Document 68; Tetrachloroethylene  
6046 WHO ([WHO 2006a](#)).

6047 EPA completed the review of environmental hazard data/information sources during risk evaluation  
6048 using the data quality review evaluation metrics and the rating criteria described in the Application of  
6049 Systematic Review in TSCA Risk Evaluations ([U.S. EPA 2018b](#)). The data quality evaluation results  
6050 indicated the quality of the studies is mostly 'high' and 'moderate', and these studies were used to  
6051 characterize the environmental hazards of PCE. The data evaluation results for PCE environmental  
6052 hazard are summarized in Table 3-1.  
6053

#### 6054 **3.1.2 Hazard Identification**

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##### 6055 *Toxicity to Aquatic Organisms*

6056 EPA assigned an overall quality level of high, medium or low to 30 acceptable studies. These studies  
6057 contained relevant aquatic toxicity data for fish, aquatic invertebrates, and aquatic plants. As shown in  
6058 Table 3-1, EPA identified 10 aquatic toxicity studies as the most relevant for quantitative assessment.  
6059 Four of the 10 studies were carried forward for characterizing the potential environmental risks from  
6060 PCE. The rationale for selecting these studies is provided in Section 3.1.3 Weight of Scientific  
6061 Evidence.  
6062

6063

**Table 3-1. Ecological Hazard Characterization of PCE for Aquatic Organisms**

Duration	Test organism	Endpoint	Hazard value <sup>1</sup> (mg/L)	Effect Endpoint	Geometric Mean <sup>2</sup> (mg/L)	References	Data Quality Evaluation Ratings
Acute	Fish	LC <sub>50</sub>	4.82 – 28.1	Mortality	12	( <a href="#">Horne et al. 1983</a> ; <a href="#">Call et al. 1979</a> )	High
	Aquatic invertebrates	LC/EC <sub>50</sub>	2.49 – 18.1	Immobilization	6.7	( <a href="#">Niederlehner et al. 1998</a> ; <a href="#">Richter et al. 1983</a> ; <a href="#">Call et al. 1980</a> )	High
Chronic	Fish	ChV	0.5-1.4	Mortality	0.84	( <a href="#">Ahmad et al. 1984</a> )	High
	Aquatic invertebrates	ChV	0.37 – 0.67	Growth	0.5	( <a href="#">Call et al. 1983</a> ; <a href="#">Richter et al. 1983</a> ; <a href="#">Hollister et al. 1968</a> )	High
	Algae	EC <sub>50</sub>	3.64 - >500	Biomass		( <a href="#">Brack and Rottler 1994</a> ; <a href="#">Hollister et al. 1968</a> )	High
		NOEC/LOEC	0.01 - 0.02	Mortality	1.4E-2	( <a href="#">Labra et al. 2010</a> )	Medium

6064

<sup>1</sup> Values in the tables are presented as reported by the study authors

6065

<sup>2</sup> Geometric mean of definitive values only (i.e. > 48 mg/L was not used in the calculation).

6066

6067

**Aquatic Environmental Hazards from Acute Exposures to PCE**

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**Fish:** EPA assigned an overall quality level of high for two acute (96-hour; flow-through) fish toxicity studies, which evaluated the median lethal concentrations (LC50s) of PCE to *Oncorhynchus mykiss* (rainbow trout) or *Menidia beryllina* (inland silverside) ([Horne et al. 1983](#); [Call et al. 1979](#)). The acute 96-hour LC50 values for fish range from 4.82 mg/L ([Call et al. 1979](#)) for *O. mykiss* to 28 mg/L ([Horne et al. 1983](#)) for inland silverside *M. beryllina*. As previously identified in the Problem Formulation document, the acute 96-hour LC 50 value of 4 mg/L ([Smith et al. 1991](#)) for flagfish (*Jordanella floridae*) was determined to be a reporting error from the study.

6074

6075

**Aquatic Invertebrates:** Three studies were assigned an overall quality level of high for acute (48-hour) toxicity to aquatic invertebrates *Ceriodaphnia dubia* and *Daphnia magna*. The studies indicate the 48-hour EC/LC50 values range from 2.5 mg/L ([Niederlehner et al. 1998](#)) to 18 mg/L ([Richter et al. 1983](#); [Call et al. 1980](#)). The geometric mean was calculated from the 48-hour EC50 and LC50 values as 6.7 mg/L. Other salt water aquatic invertebrate toxicities range from 96-hour LC 50 of 2.9 mg/L ([Hollister et al. 1968](#)) for mysid shrimp (*Mysidopsis bahia*) to 24-hour LC 50 of 23 mg/L ([Sanchez-Fortun et al. 1997](#)) for Brine shrimp (*Artemia salina*). The 48-hour acute toxicity to midge larvae (*Tanytarsus dissimilis*) show LC 50 of 31 mg/L and EC50 of 7.0 mg/L ([Call et al. 1979](#)).

6082

6083

**Aquatic Environmental Hazards from Chronic Exposures to PCE:**

6084 **Fish:** A single chronic 32-day toxicity study on exposure of *Pimphales promelas* (fathead minnow) to  
6085 PCE was assigned an overall quality level of high ([Ahmad et al. 1984](#)). The reported NOEL - LOEL  
6086 values of 0.5 - 1.4 mg/l, respectively, based on growth and mortality of *P. promelas* exposure to PCE  
6087 ([Ahmad et al. 1984](#)). The geometric mean was used to calculate the chronic toxicity value of 0.84 mg/L.

6088 **Aquatic Invertebrates:** Three studies were assigned an overall quality level of high for chronic (28-day)  
6089 toxicity to aquatic invertebrates *Daphnia magna* ([Richter et al. 1983](#); [Call et al. 1980](#)), *Americamysis*  
6090 *bahia* (opossum shrimp) ([Hollister et al. 1968](#)) from exposure to PCE. The *D. magna* 28-day study  
6091 reported a NOEC value of 0.5 mg/L using reproduction based on measured concentrations ([Richter et al.](#)  
6092 [1983](#); [Call et al. 1980](#)). The 28-day *A. bahia* reported NOEC value of 0.4 mg/L and LOEC of 0.7 mg/L  
6093 ([Hollister et al. 1968](#)). The geometric mean was calculated from the NOEC and LOEC values to derive  
6094 the chronic toxicity value of 0.5 mg/L.

6095 **Aquatic Plants:** Three studies were assigned an overall quality level of high for EC<sub>50</sub> endpoint ([Brack](#)  
6096 [and Rottler 1994](#); [Hollister et al. 1968](#)) and medium for NOEC/LOEC ([Labra et al. 2010](#)) from exposure  
6097 to PCE. The algal toxicity 72/96-hr EC<sub>50</sub> values were 3.6 for *Chlamydomonas reinhardtii* (Brack 1994)  
6098 to greater than 500 mg/L for fresh and saltwater algae (Hollister, 1968) based on biomass and  
6099 abundance. The algal species in the Hollister study were not specified. The most conservative toxicity  
6100 values were reported for *Pseudokirchneriella subcapitata* (green microalgae) 72-hour study using  
6101 NOEC - 1.0E-2 mg/L and LOEC - 2.0E-2 mg/L based on mortality ([Labra et al. 2010](#)). The geometric  
6102 mean was calculated from the NOEC and LOEC values to derive the algal toxicity value of 1.4E-2  
6103 mg/L.

6104 As noted in the Problem Formulation, EPA did not include PCE hazard toxicity to terrestrial mammals  
6105 in this risk evaluation. Observed effects in laboratory mammals that occurred at much higher  
6106 concentrations that have been measured or are predicted to occur in the environment. Additionally, as  
6107 noted in Section 2.1, the bioconcentration factor and bioaccumulation potential of PCE is low.  
6108 Therefore, it is unlikely that adverse effects will occur on the terrestrial mammalian exposure pathway  
6109 ([Eu 2001](#)).  
6110

### 6111 **3.1.3 Weight of Scientific Evidence**

6112 During the data integration stage of systematic review EPA analyzed, synthesized, and integrated the  
6113 data/information into Table 3-1. This involved weighing scientific evidence for quality and relevance,  
6114 using a weight-of-scientific-evidence approach, as defined in 40 CFR 702.33, and noted in TSCA 26(i)  
6115 ([U.S. EPA 2018b](#)).  
6116

6117 During data evaluation, EPA assigned studies an overall quality level of high, medium, or low based on  
6118 the TSCA criteria described in the Application of Systematic Review in TSCA Risk Evaluations ([U.S.](#)  
6119 [EPA 2018b](#)). While integrating environmental hazard data for PCE, EPA gave more weight to relevant  
6120 data/information that were assigned an overall quality level of high or medium. Only data/ information  
6121 that EPA assigned an overall quality level of high or medium was used for the environmental risk  
6122 assessment. Data that EPA assigned an overall quality level of low was used to provide qualitative  
6123 characterization of the effects of PCE exposures in aquatic organisms. Any information that EPA  
6124 assigned an overall quality of unacceptable was not used. EPA determined that data and information  
6125 were relevant based on whether it had biological, physical/chemical, and environmental relevance ([U.S.](#)  
6126 [EPA 1998](#)):

- 6127 • Biological relevance: correspondence among the taxa, life stages, and processes measured or  
6128 observed and the assessment endpoint.
- 6129 • Physical/chemical relevance: correspondence between the chemical or physical agent tested and  
6130 the chemical or physical agent constituting the stressor of concern.
- 6131 • Environmental relevance: correspondence between test conditions and conditions in the  
6132 environment ([U.S. EPA 1998](#)).

6133 To calculate COCs, EPA derived geometric means for each trophic level that had comparable toxicity  
6134 values (e.g., multiple EC<sub>50</sub>s measuring the same or comparable effects from various species within a  
6135 trophic level). EPA did not use non-definitive toxicity values (e.g., EC<sub>50</sub> > 48 mg/L) to derive geometric  
6136 means because these concentrations of PCE were not high enough to establish an effect on the test  
6137 organism.

6138  
6139 To assess aquatic toxicity from acute exposures, data for two taxonomic groups were available: fish, and  
6140 aquatic invertebrates. For each taxonomic group, data were available for multiple species, and geometric  
6141 means were calculated as shown in Table 3-1. The geometric mean of the EC<sub>50</sub>s and LC<sub>50</sub>s for aquatic  
6142 invertebrates, 6.7mg/L, represented the most sensitive toxicity value derived from each of the two  
6143 taxonomic groups, and this value was used to derive an acute COC as described in Section 3.1.4. This  
6144 value is from two studies that EPA assigned an overall quality of high.

6145  
6146 To assess aquatic toxicity from chronic exposures, data for two taxonomic groups were described in the  
6147 acceptable literature: fish, and aquatic invertebrates. Aquatic invertebrates were also the most sensitive  
6148 taxonomic group for chronic exposures. The chronic 72-hour NOEC = 0.01 mg/L and LOEC = 2.0E-2  
6149 mg/L values were used to derive a chronic COC in Section 3.1.4. This value was from two studies that  
6150 EPA assigned an overall quality level of high.

6151  
6152 To assess the toxicity of PCE to algae, data from three species were available from studies that EPA  
6153 assigned an overall quality level of high and medium. EC<sub>50</sub>s measuring biomass ranged from 3.6 mg/L  
6154 to >500 mg/L. A NOEC = 1.0E-2 mg/L and LOEC = 2.0E-2 mg/L was also reported. Because these  
6155 values varied by greater than an order of magnitude, EPA used the NOEC/LOEC mortality endpoint for  
6156 the most sensitive algal species to represent algae as a whole. These values, from one medium quality  
6157 algae study, was used to derive an algae COC in Section 3.1.4.

6158  
6159 Based on the estimated bioconcentration factor and bioaccumulation potential described in Section 2.1,  
6160 PCE does not bioaccumulate in biological organisms. Therefore, EPA did not assess hazards to aquatic  
6161 species from trophic transfer and bioconcentration or accumulation of PCE.

### 6163 **3.1.4 Concentrations of Concern (COC)**

6164 EPA calculated the COCs for aquatic species based on the environmental hazard data for PCE, using  
6165 EPA methods ([U.S. EPA 2013](#), [2012b](#)). While there was data representing fish, aquatic invertebrates,  
6166 and aquatic plants, the data were not robust enough to conduct a more detailed species sensitivity  
6167 distribution analysis. Therefore, EPA chose to establish COC as protective cut-off standards above  
6168 which acute or chronic exposures to PCE are expected to cause effects for each taxonomic group in the  
6169 aquatic environment. The COC is typically based on the most sensitive species or the species with the  
6170 lowest toxicity value reported in that environment. For PCE, EPA derived an acute and a chronic COC  
6171 for fish and aquatic invertebrates. Algae was assessed separately and not incorporated into acute or

6172 chronic COCs, because durations normally considered acute for other species (e.g. 48, 72 hours) can  
6173 encompass several generations of algae.

6174  
6175 After weighing the scientific evidence and selecting the appropriate toxicity values from the integrated  
6176 data to calculate acute, chronic, and algal COCs, EPA applied an assessment factor (AF) according to  
6177 EPA methods ([U.S. EPA 2013, 2012b](#)), when possible. An assessment factor (AF) is applied to the acute  
6178 and chronic hazard endpoints for aquatic species to calculate a Concentration of Concern (COC) for use  
6179 in the screening-level analysis of environmental hazards. The application of AFs provides a lower bound  
6180 effect level that would likely encompass more sensitive species not specifically represented by the  
6181 available experimental data. AFs can also account for differences in inter- and intra-species variability,  
6182 as well as laboratory-to-field variability. These AFs are dependent on the availability of datasets that can  
6183 be used to characterize relative sensitivities across multiple species within a given taxa or species group.  
6184 They are often standardized in risk assessments conducted under TSCA, since the data available for  
6185 most industrial chemicals are limited. For fish and aquatic invertebrates (e.g., daphnia) the acute COC  
6186 values are divided by an AF of 5. For chronic COCs, an AF of 10 is used. The COC for algae, where  
6187 multiple generations can be present over the course of a standard toxicity test, an AF of 10 is used. The  
6188 use of these assessment factors are consistent with EPA methodology for the screening and assessment  
6189 of industrial chemicals ([U.S. EPA 2013, 2012b](#)).

6190  
6191 After applying AFs, EPA converts COC units from mg/L to  $\mu\text{g/L}$  (or ppb) in order to more easily  
6192 compare COCs to surface water concentrations during risk characterization.

6193

#### 6194 *Acute COC*

6195 To derive an acute COC for PCE, EPA used the geometric mean of the  $\text{EC}_{50}$ s and  $\text{LC}_{50}$ s for aquatic  
6196 invertebrates, which is the most sensitive acute value for aquatic species from the data integrated for  
6197 PCE, from two studies EPA assigned overall quality ratings of high ([Niederlehner et al. 1998](#); [Call et al.  
6198 1980](#)). The geometric mean of 6.7 mg/L was divided by the AF of five for aquatic invertebrates and  
6199 multiplied by 1,000 to convert from mg/L to  $\mu\text{g/L}$ , or ppb.

6200

6201 The acute COC = (6.7 mg/L) / AF of 5 = 1.3 mg/L x 1,000 = 1,342  $\mu\text{g/L}$  or ppb.

6202

- 6203 • The acute COC for PCE is 1,342 ppb.

6204

#### 6205 *Chronic COC*

6206 EPA derived the aquatic invertebrates chronic COC was from the lowest chronic toxicity value from the  
6207 integrated data using the geometric mean of NOEC and LOEC for growth effects in opossum shrimp  
6208 ([Hollister et al. 1968](#)). The geometric mean was then divided by an assessment factor of 10, and then  
6209 multiplied by 1,000 to convert from mg/L to  $\mu\text{g/L}$ , or ppb.

6210

6211 The chronic COC = (0.5 mg/L) / AF of 10 = 5.0E-2 mg/L x 1,000 = 50  $\mu\text{g/L}$  or ppb.

6212

- 6213 • The aquatic invertebrates chronic COC for PCE is 50 ppb.

6214

6215 EPA also derived a chronic COC for fish for comparison to the aquatic invertebrate chronic data. The  
6216 fish chronic COC was derived from the most sensitive chronic toxicity value (ChV) from the integrated

6217 data using the geometric mean of NOEC and LOEC for measuring mortality in fathead minnow from a  
6218 study that EPA assigned a quality level of high ([Ahmad et al. 1984](#)). The ChV was then divided by an  
6219 assessment factor of 10, and then multiplied by 1,000 to convert from mg/L to µg/L, or ppb.

6220  
6221 The chronic COC = (0.84 mg/L) / AF of 10 = 0.084 mg/L x 1,000 = 84 µg/L or ppb.

- 6222 • The fish chronic COC for PCE is 84 ppb.

#### 6224 ***Algal COC***

6225 The algal COC was derived from the integrated data using the geometric mean of NOEC and LOEC  
6226 value for algae mortality ([Labra et al. 2010](#)). The algal toxicity value of 0.014 mg/L was then divided by  
6227 an assessment factor of 10, and then multiplied by 1,000 to convert from mg/L to µg/L, or ppb.

6228  
6229 The algal COC = (1.4E-2 mg/L) / AF of 10 = 1.4E-3 mg/L x 1000 = 1.4 µg/L or ppb.

- 6230 • The algal COC is 1.4 ppb.

### 6233 **3.1.5 Summary of Environmental Hazard**

---

#### 6234 ***Acute and Chronic Aquatic Toxicity***

6235 EPA concludes that PCE presents a hazard for acute exposure duration in aquatic invertebrates, with  
6236 acute toxicity values as low as 2.5 mg/L, based on immobilization in *Ceriodaphnia dubia* and *Daphnia*  
6237 *magna* ([Niederlehner et al. 1998](#)) to 18 mg/L ([Call et al. 1980](#)). Acute 96-hour exposures to PCE for fish  
6238 based on mortality LC<sub>50</sub> toxicity values for rainbow trout of 4.8 mg/L to inland silverside of 28 mg/L  
6239 (resulting in a geometric mean of 12 mg/L). For chronic exposures to fish, PCE has a hazard values as  
6240 low as 0.8 mg/L. For chronic exposure to aquatic invertebrates, PCE has a chronic toxicity value of 0.5  
6241 mg/L. In algal species, where exposure durations are considered separate from chronic as they can  
6242 encompass several generations of algae, PCE has a chronic toxicity value of 1.4E-2 mg/L.

#### 6243 ***Concentrations of Concern***

6244  
6245 The acute and chronic COCs derived for aquatic organisms are summarized in Table 3-2. EPA  
6246 calculated the acute COC for PCE exposures in aquatic invertebrates as 1,342 ppb, based on the  
6247 geometric mean of EC<sub>50s</sub> and LC<sub>50s</sub> from two studies that EPA assigned an overall quality level of high  
6248 ([Niederlehner et al. 1998](#); [Call et al. 1980](#)). EPA calculated the chronic COC for PCE exposures in  
6249 aquatic invertebrates as 50 ppb, based on the geometric mean of NOEC and LOEC for growth from a  
6250 single study that EPA assigned an overall quality level of high ([Hollister et al. 1968](#)).

6251  
6252 For comparison with other trophic levels, EPA calculated the fish chronic COC for PCE of 84 ppb,  
6253 based on the geometric mean of the NOEL and LOEL from a single study that EPA assigned an overall  
6254 quality level of high ([Hollister et al. 1968](#)). As noted previously, algal hazard values from exposures to  
6255 PCE, for 96-hour durations, are considered separately from other aquatic species because algae can  
6256 cycle through several generations in this time frame. The algal COC of 1.4 ppb is based on the  
6257 geometric mean of the NOEL and LOEL from a single study that EPA assigned an overall quality level  
6258 of medium ([Labra et al. 2010](#)).

#### 6259 ***Confidence in COCs***

6262 Based on the data quality, weight of scientific evidence, and uncertainties (see Section 4.3.1),  
 6263 confidence in acute and chronic COCs for fish and invertebrates are high. The COC for algae is based  
 6264 on a single study that EPA assigned an overall quality level of medium. Additionally, algae species tend  
 6265 to vary widely in their sensitivity to chemical pollutants, and data were only available for three algal  
 6266 species and may not represent the most sensitive species at a given site. Therefore, confidence in algae  
 6267 COC is medium.

6268  
 6269 **Table 3-2. COCs for Environmental Toxicity**

<b>Environmental Aquatic Toxicity</b>	<b>Hazard Value (µg/L)</b>	<b>Assessment Factor</b>	<b>COC (µg/L or ppb)</b>
Toxicity to Aquatic Invertebrates from Acute Exposures	6,710	5	1,342
Toxicity to Aquatic Invertebrates from Chronic Exposures	500	10	50
Toxicity to Fish from Chronic Exposures	840	10	84
Algal Toxicity	14	10	1.4

6270

6271

6272

## 3.2 Human Health Hazards

6273

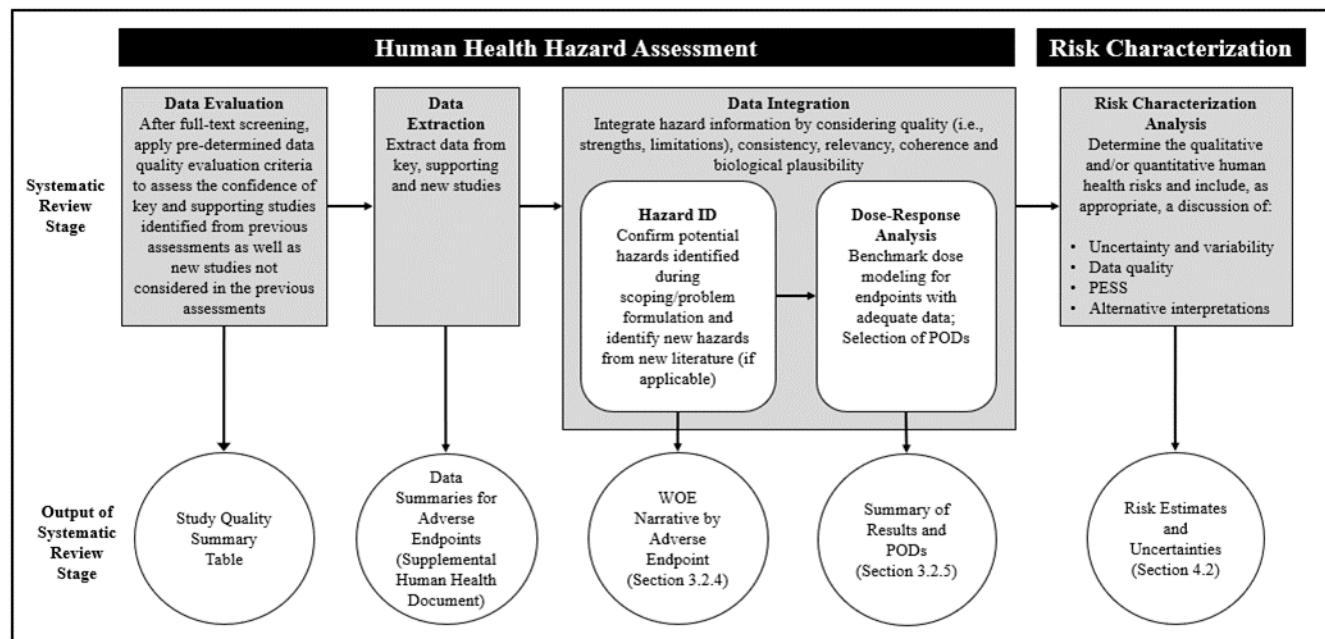
### 3.2.1 Approach and Methodology

6274

EPA used the approach described in Section 1.5 to evaluate, extract and integrate PCE's human health hazard and dose-response information.

6275

6276



6277

6278

**Figure 3-1. EPA Approach to Hazard Identification, Data Integration, and Dose-Response Analysis for PCE**

6279

6280

6281

Specifically, EPA reviewed key and supporting information from previous human health hazard assessments as well as the existing body of knowledge on PCE's human health hazards. These data sources included an existing EPA IRIS Assessment ([U.S. EPA 2012c](#)) and an ATSDR Toxicological Profile (since finalized as ([ATSDR 2019](#))); hence, many of the human health hazards of PCE have been previously compiled and systematically reviewed.

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All human health hazards of PCE previously identified in these reviews were described and reviewed in this risk evaluation, including: acute toxicity, neurotoxicity, kidney toxicity, liver toxicity,

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reproductive/developmental toxicity, immune and hematological effects, irritation, and cancer. EPA relied heavily on the aforementioned existing reviews along with scientific support from the Office of Research and Development in preparing this risk evaluation. Development of the PCE hazard and dose-response assessments considered EPA and National Research Council (NRC) risk assessment guidance.

Any identified new literature published since these previous assessments was screened against inclusion criteria in the PECO statement and the relevant studies (e.g., useful for dose-response)<sup>16</sup> were further evaluated using the data quality criteria for human, animal, and *in vitro* studies described in the

<sup>16</sup> Some of the studies that were excluded based on the PECO statement were considered later during the systematic review process as needed. For example, EPA reviewed mode of action information to qualitatively support the health hazard assessment.



6297 *Application of Systematic Review in TSCA Risk Evaluations* document ([U.S. EPA 2018b](#)). EPA skipped  
6298 the screening step (for relevance to PCE) of the key and supporting studies identified in previous  
6299 assessments and entered them directly into the data evaluation step based on their previously identified  
6300 relevance to the chemical([U.S. EPA 2018b](#)). EPA skipped the screening step (for relevance to PCE) of  
6301 the key and supporting studies identified in previous assessments and entered them directly into the data  
6302 quality evaluation step based on their previously identified relevance to the chemical.

6303  
6304 EPA considered studies of low, medium, or high confidence for the weight of scientific evidence (WOE)  
6305 for hazard identification and dose-response analysis. Information from studies that were rated  
6306 unacceptable were only discussed on a case-by-case basis for hazard ID and weight-of-scientific-  
6307 evidence assessment but were not considered for dose-response analysis.

6308  
6309 EPA has not developed data quality criteria for all types of hazard information. This is the case for  
6310 toxicokinetics and many types of mechanistic data which EPA typically uses for qualitative support  
6311 when synthesizing evidence. As appropriate, EPA evaluated and summarized these data to determine  
6312 their utility with supporting the risk evaluation.

6313  
6314 Following the data quality evaluation, EPA extracted the toxicological information from each relevant  
6315 study. In the last step, the strengths and limitations of the data were evaluated for each endpoint and a  
6316 weight-of-the-scientific evidence narrative was developed. Data for each selected hazard endpoint  
6317 underwent dose-response analysis. Finally, the results were summarized, and the uncertainties were  
6318 presented. The process is described in Figure 3-1. The WOE analysis included integrating information  
6319 from toxicokinetics, toxicodynamics in relation to the key hazard endpoints: acute overt toxicity, liver  
6320 toxicity, kidney toxicity, neurotoxicity, immunotoxicity (including sensitization), reproductive toxicity,  
6321 developmental toxicity, and cancer. EPA selected human health studies that were of high quality and  
6322 relevance to move forward for dose-response analysis in order to quantitatively assess each key hazard  
6323 endpoint.

6324  
6325 Summaries for all studies considered for this draft risk evaluation, the no-observed- or lowest-observed-  
6326 adverse-effect levels (NOAEL and LOAEL) for non-cancer health endpoints by target organ/system, the  
6327 incidence for cancer endpoints, and the results of the data quality evaluation are provided in *Draft Risk*  
6328 *Evaluation for Perchloroethylene Data Quality Evaluation of Human Health Hazard Studies* and *Data*  
6329 *Extraction for Human Health Hazard Studies*. ([U.S. EPA 2020g](#)).

6330  
6331 EPA considered points of departure (POD) from studies that were PECO relevant, scored acceptable in  
6332 the data quality evaluation, and contained adequate dose-response information. The POD is a dose or  
6333 concentration near the lower end of the observed range without significant extrapolation to lower doses.  
6334 It is used as the starting point for subsequent dose-response (or concentration-response) extrapolations  
6335 and analyses. PODs can be a no-observed-adverse-effect level (NOAEL), a lowest-observed-adverse-  
6336 effect level (LOAEL) for an observed incidence, or change in level of response, or the lower confidence  
6337 limit on the dose at the benchmark dose (BMDL)<sup>17</sup>. PODs were adjusted as appropriate to conform to  
6338 the specific exposure scenarios evaluated. Section 3.2.5 describes the dose-response assessment guiding  
6339 the selection of PODs for non-cancer endpoints.

---

<sup>17</sup> The benchmark dose (BMD) is a dose or concentration that produces a predetermined change in response range or rate of an adverse effect (called the benchmark response or BMR) compared to baseline.

### 3.2.2 Toxicokinetics

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The toxicokinetics and PBPK modeling of PCE were thoroughly described in the 2012 EPA IRIS Assessment ([U.S. EPA 2012e](#)). This discussion is summarized below.

#### 3.2.2.1 Absorption/Distribution/Metabolism/Elimination (ADME)

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##### 3.2.2.1.1 Absorption

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###### **Inhalation**

Inhalation is considered to be the major exposure route, and studies on both humans and animals confirm that PCE is both rapidly and readily absorbed via pulmonary uptake (with equilibrium occurring after several hours). The blood:gas coefficient ranges from ~10-20, indicating that PCE readily moves from alveoli into the bloodstream. For the purposes of this risk evaluation, EPA conservatively assumes 100% absorption through the lungs.

###### **Oral**

For oral exposures, studies in mice, rats, and dogs demonstrate that absorption of PCE through the gut is essentially complete (i.e. 100%).

###### **Dermal**

Dermal exposure to PCE vapors is estimated to result in minimal dermal uptake compared to inhalation of those vapors (only ~1% absorbed dermally compared to inhaled). However, studies indicate that dermal absorption may be significant for direct skin application of PCE. Complete (i.e. 100%) absorption may be achieved in scenarios of impeded evaporation or complete immersion, and this risk evaluation assumes that up to 100% of the delivered dermal dose (i.e. after accounting for evaporation or in scenarios with impeded evaporation) is absorbed. Volatilization from the skin is accounted for in the occupational exposure assessment by the *Dermal Exposure to Volatile Liquids Model* based on a theoretical framework provided by Kasting and Miller ([2006](#)). The amount of liquid on the skin is adjusted by the weight fraction of PCE in the liquid to which the worker is exposed. Specific details of the dermal occupational exposure assessment can be found in Section 2.4.1.29. For the consumer risk assessment, dermal exposure is assessed using the Consumer Exposure Model (CEM; ([U.S. EPA 2017a](#))) permeability dermal sub-model based on the ability of a chemical to penetrate the skin layer once contact occurs. The CEM permeability model assumes a constant supply of chemical, directly in contact with the skin, throughout the exposure duration. This model was applied only to consumer COUs where evaporation is inhibited, or prohibited, or full immersion of a body part occurs during use. The permeability method does NOT consider evaporation and is more representative of these COU types. For the consumer risk assessment, absorption is assessed using permeability model which uses an absorption rate as opposed to a steady-state percentage (Section 2.4.2.2.2).

###### **Distribution**

PCE is broadly distributed to all tissues and can cross both the blood:brain barrier and placenta. The highest concentrations are found in adipose tissues due to the lipophilicity of the chemical. Accordingly, PCE concentrations are higher in the brain and liver than many other tissues and it becomes concentrated in human breast milk. Skeletal muscle has been measured to contain the lowest concentration of any tissue. Long residence time in adipose tissue can result in increasing body burden with continuous or repeated exposures.

##### 3.2.2.1.2 Metabolism

---

PCE is metabolized in laboratory animals and in humans through at least two distinct pathways:

- 6385 1) oxidative metabolism via the cytochrome P450 (CYP [also abbreviated as P450]) mixed-function  
6386 oxidase system;  
6387 2) glutathione (GSH) conjugation followed by subsequent further biotransformation and processing,  
6388 either through the cysteine conjugate  $\beta$ -lyase pathway or by other enzymes including flavin-containing  
6389 monooxygenase 3 (FMO3) and CYP3A.

6390  
6391 The conjugative pathway is toxicologically significant because it yields relatively potent toxic  
6392 metabolites, however studies in both animals and humans indicate that overall metabolism of PCE is  
6393 relatively limited—particularly at higher exposures. Oxidative metabolism is the more dominant  
6394 pathway in rodents, however the relative contribution of each in humans has not been determined.  
6395 Available data presents a wide range of estimates for amount of PCE metabolized, depending on dose  
6396 level and species (less metabolized at higher doses, and less metabolized in mice compared to rats).  
6397 PBPK modeling estimated that at existing occupational regulatory levels only 1.5% of inhaled PCE  
6398 would be metabolized, while at air concentrations of only 0.001 ppm a median estimate of 23-36%  
6399 would be metabolized.

#### 6400 6401 **Oxidative Metabolism**

6402 CYP-mediated oxidative metabolism occurs predominantly in the liver, irrespective of the exposure  
6403 route, and oxidative metabolites are generally responsible for PCE liver toxicity. The major oxidative  
6404 metabolite is trichloroacetic acid (TCA), which is believed to derive primarily from the upstream  
6405 metabolite of trichloroacetyl chloride (through hydrolysis or interaction with peptide amino groups).  
6406 Dichloroacetic acid (DCA) has also been detected in urine, and DCA may form either due to further  
6407 metabolism of TCA or via bioactivation of GSH conjugates. Oxalic acid is also believed to be a major  
6408 urinary metabolite (at least in rats). Trichloroethanol (TCOH) may also be produced, but conflicting data  
6409 suggests that detected TCOH may only be due to cross-contamination from the closely related chemical,  
6410 trichloroethylene. Oxidative metabolism occurs at a faster and greater overall rate in rodents compared  
6411 to humans, however the half-life of these metabolites is much greater in humans (up to 15x longer).  
6412 Variability in CYP metabolic capacity is generally believed to vary by approximately 10-fold among all  
6413 humans, however individual variations in *in vitro* CYP2E1 activity as high as 20-50 fold have also been  
6414 reported. There is also large variability in CYP2E1 activity across different tissues. For ingested  
6415 chemical, first pass through the liver would be expected to be responsible for the majority of oxidative  
6416 metabolism and subsequent metabolites would travel through the blood to reach target sites. For other  
6417 routes, these tissue-specific differences may result in varying downstream toxicological activity. The  
6418 PBPK model is expected to account for the majority of tissue variability via oral or inhalation routes.

#### 6419 6420 **Conjugative Metabolism**

6421 The GSH-mediated conjugative pathway begins in the liver, with transport of the initial GSH conjugate  
6422 (S-(1,2,2-trichlorovinyl) glutathione or TCVG) and its cysteine counterpart (TCVC) to the kidney target  
6423 organ. While the pathway was originally demonstrated only in rodents, it has since been confirmed to  
6424 exit in humans, although the relative susceptibility of humans for TCVG production compared to  
6425 rodents is unclear. Transport to the kidney (primarily) results in further processing and associated renal  
6426 toxicity. This toxicity is associated at least in part with the activity of  $\beta$ -lyases, which cleave TCVC to  
6427 yield an unstable thiol, resulting in cytotoxic and mutagenic reactive metabolites. FMO3 can also  
6428 produce another reactive metabolite, TCVC sulfoxide (TCVCSO), and other sulfoxide species can be  
6429 produced through CYP3A metabolism of other conjugative metabolites.

#### 6430 6431 **Species Differences**

6432 The rate of metabolism of PCE is faster in rodents than humans resulting in higher metabolite  
6433 concentrations in blood. The half-life of these metabolites is significantly longer for humans however  
6434 (144 hrs in humans vs 10 hrs or less in rodents), meaning that they can impart toxicological effects over  
6435 a longer period of time. TCA is the major oxidative metabolite produced in both rats and humans as  
6436 indicated by its detection in urine, however as mentioned it is detected at much higher blood  
6437 concentrations (3-8 fold) in rats with a much faster half-life (>4-fold). These results are in agreement  
6438 with known differences in metabolic rates in general between species, for which mice are faster than rats  
6439 which are faster than humans.

6440  
6441 Additional tissue and MOA-specific details on PCE metabolites are also provided in the Mode of Action  
6442 section, Section 3.2.3.2.4

### 6443 **3.2.2.1.3 Elimination**

6444 PCE is primarily eliminated through pulmonary excretion of the parent compound independent of  
6445 exposure route. Urinary excretion is the primary route for metabolites, although metabolites are also  
6446 excreted through the lungs as a minor pathway.

6447 Half-life of PCE from blood-rich tissues, muscle, and adipose tissue is 12-16 hours, 30-40 hours, and  
6448 55-65 hours, respectively. In rodents, as body burden increases the percentage excreted as unchanged  
6449 parent compound also increases (due to decreased metabolism, see Section 3.2.2.1.2). Pulmonary  
6450 excretion rate is dose-independent, related instead to ventilation rate, cardiac output, and the relative  
6451 solubility of PCE in blood and tissue. In contrast, urinary excretion of metabolites is dose-  
6452 dependent and rate-limited.

### 6453 **3.2.2.2 PBPK Modeling**

6454 The 2012 EPA IRIS Assessment ([U.S. EPA 2012e](#)) contains a Physiologically Based Pharmacokinetic  
6455 (PBPK) model for PCE. The most recent analysis by Chiu and Ginsberg ([2011a](#)) improved on several  
6456 earlier models. EPA has made the model code available for download via the internet. The detailed  
6457 code is publicly available through EPA's HERO database ([Chiu and Ginsberg 2011b](#)).

6458  
6459 The model structure allowed it to be used to calculate internal dose metrics for inhaled and oral exposure  
6460 to PCE for mice, rats, and humans. Thus, the analysis could be used for route-to-route extrapolation or  
6461 interspecies extrapolation, comparison of parent and metabolite toxicity based on a common internal  
6462 dose metric, and investigation of the shape of the dose-response curve. The following dose metrics could  
6463 be determined using this model:

- 6464 • Daily area-under-the-curve (AUC) of PCE in blood
- 6465 • Fraction of PCE intake metabolized by oxidation
- 6466 • Fraction of PCE intake metabolized by GSH conjugation
- 6467 • Equivalent daily production of TCA per kg body weight.

6468 Of note, a full Bayesian uncertainty/variability analysis was not performed. Therefore, the model could  
6469 not be used to represent the range of intraspecies human variability and was of limited utility for human  
6470 studies not requiring route-to-route extrapolation.

6471  
6472 The highest confidence dose metric is AUC in blood, with the main source of uncertainty for the metric  
6473 being the residual difference between model predictions and the calibration/validation data (about 2-fold  
6474 for each species). The next highest confidence is for estimates of PCE oxidation and TCA formation,  
6475 again with approximately a 2-fold residual difference between predictions and data. There is large

6476 interindividual variability in PCE oxidation that is not captured by the model in the absence of a  
6477 Bayesian analysis. The model predicts decreasing oxidative metabolism from mice to rats to humans,  
6478 meaning that humans are predicted to receive a smaller internal dose for the same applied dose  
6479 compared to rodents, after accounting for body weight scaling. For cross-species extrapolation, the  
6480 default assumption of equivalent air concentrations leading to equivalent internal doses appears correct  
6481 based on AUC estimates.

6482  
6483 There is greater uncertainty for estimates of GSH conjugation, especially in humans. The data suggests  
6484 an approximate 2-fold range of uncertainty in rats, however there is minimal available data in mice  
6485 leading to a ~60-fold range. The human estimates are extremely uncertain, with two local maxima in the  
6486 model fits resulting in model predictions differing by up to 3,000-fold based on results of different  
6487 optimization runs. Due to this very broad uncertainty range, the model can result in humans having  
6488 either equal or greater GSH conjugation compared to rats, for which only ~1% of dosed PCE undergoes  
6489 GSH metabolism.

### 6490 **3.2.3 Hazard Identification**

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#### 6491 **3.2.3.1 Non-Cancer Hazards**

---

6492 The 2012 EPA IRIS Assessment ([U.S. EPA 2012c](#)) evaluated the following non-cancer hazards that may  
6493 be associated with PCE exposures: the central nervous system (neurotoxicity), kidney, liver and  
6494 development and reproduction. In general, neurological effects were found to be associated with lower  
6495 PCE inhalation exposures than what produced other noncancer adverse effects. According to the 2012  
6496 EPA IRIS Assessment ([U.S. EPA 2012c](#)), support for an association with immune and blood effects  
6497 were less well characterized. In their Toxicological Profile for PCE, ATSDR ([2019](#)) identified similar  
6498 hazard concerns. The National Advisory Committee for Acute Exposure Guideline Levels for  
6499 Hazardous Substances ([U.S. EPA 2009](#)) also identified irritation as a hazard concern. Since the EPA  
6500 IRIS Assessment 13 new studies were identified and evaluated during the systematic review process.  
6501 These new studies add further evidence to support the conclusions established in the EPA IRIS and  
6502 ATSDR assessments ([ATSDR 2019](#)).

##### 6503 **3.2.3.1.1 Acute Toxicity and Irritation**

---

6504 Data from acute exposure studies in animals and human incidents indicate that short term exposure to  
6505 PCE may cause irritation and neurotoxicity and can impair cognitive function in humans ([U.S. EPA](#)  
6506 [2012c](#)). An Acute Exposure Guidance Limit (AEGL) values, established by the National Advisory  
6507 Committee for Acute Exposure Guideline Levels for Hazardous Substances ([U.S. EPA 2009](#)), has been  
6508 developed based on irritation to humans (AEGL-1), ataxia in rodents (AEGL-2), and lethality in mice  
6509 (AEGL-3) ([U.S. EPA 2009](#)). Epidemiological studies since the EPA IRIS Assessment focused on  
6510 chronic exposures.

6511  
6512 There is sufficient evidence from controlled human exposure studies that acute-duration ( $\leq 24$  hours)  
6513 inhalation exposure to PCE induces symptoms of CNS depression and prolonged visual evoked potential  
6514 latencies ([ATSDR 2019](#); [U.S. EPA 2012c, 2009](#); [Altmann et al. 1990](#); [Hake and Stewart 1977](#)). While  
6515 more limited, case reports show that CNS depression (including coma/ unconsciousness at sufficiently  
6516 high doses) also occurs in humans after oral exposure to PCE ([ATSDR 2019](#)). Sufficient information in  
6517 acute-duration studies in animals exposed by inhalation or oral gavage also shows CNS depression  
6518 ([ATSDR 2019](#); [U.S. EPA 2009](#)) as well as reduced amplitude of visual evoked potentials, impaired  
6519 sustained attention, prolongation of escape-directed behaviors after inhalation exposure ([ATSDR 2019](#);

6520 [U.S. EPA 2012c](#); [Boyes et al. 2009](#); [Oshiro et al. 2008](#)) and reduce operant response behavior or  
6521 increased seizure threshold ([ATSDR 2019](#)) after oral exposure.

6522  
6523 Human controlled-exposure studies and case reports demonstrated concentration-related increases in the  
6524 incidence and severity of eye and upper respiratory tract irritation ([ATSDR 2019](#); [U.S. EPA 2009](#)).

6525 There are also reports of greater excitement and struggling in beagle dogs exposed to PCE by facemask  
6526 ([ATSDR 2019](#)), however this is not adequate evidence to indicate an association with respiratory tract  
6527 irritation in animals.

6528  
6529 Data pertaining to hepatic effects in humans exposed acutely to PCE consist of only a single case report  
6530 ([U.S. EPA 2012c](#)). Dose-related hepatic effects following acute gavage administration to mice  
6531 including increased serum ALT, fatty degeneration and necrosis, and cytoplasmic vacuolation ([ATSDR](#)  
6532 [2019](#)).

### 6533 **3.2.3.1.2 Neurotoxicity**

6534 The neurological effects of PCE in humans have been extensively studied. Findings in humans are  
6535 supported by a more limited number of animal studies. The EPA IRIS Toxicological Review for PCE  
6536 ([U.S. EPA 2012c](#)) provides the basis for the information below from studies published up to that time;  
6537 more recent studies are also discussed. The review performed by EPA IRIS ([U.S. EPA 2012c](#)) identified  
6538 visual deficits in human studies, especially diminished color discrimination, as the most sensitive  
6539 endpoint of PCE exposure. With one exception, newer human studies have not materially added to the  
6540 database of PCE effects on visual function; instead, these studies have focused on symptoms of  
6541 neurotoxicity ([Lucas et al. 2015](#)), risks of neurodegenerative diseases ([Bove et al. 2014b](#); [Goldman et al.](#)  
6542 [2012](#)), risks of autism spectrum disorder ([Aschengrau et al. 2016a](#); [Aschengrau et al. 2011](#)) or risky  
6543 behaviors and head injuries ([Aschengrau et al. 2016a](#); [Aschengrau et al. 2011](#)) after prenatal or early  
6544 childhood exposure. One study published since the 2012 IRIS Assessment ([U.S. EPA 2012c](#)) assessed  
6545 visual function of a residential population exposed to PCE in contaminated drinking water ([Getz et al.](#)  
6546 [2012](#)). There have been no oral or inhalation repeated-exposure animal studies published after the IRIS  
6547 Assessment that evaluated sensitive neurological endpoints.

## 6548 **Human Evidence**

### 6549 ***Visual Function***

6551 Human studies have documented an association between impairments in visual contrast sensitivity and  
6552 color discrimination and PCE exposure in both occupational and residential settings ([U.S. EPA 2012c](#)).  
6553 Cavalleri et al. (1994) and Gobba et al. (1998), inform the relationship between impaired color  
6554 discrimination and PCE exposure. Cavalleri et al. (1994) observed a significant positive correlation  
6555 between time-weighted average concentrations of PCE and the Color Confusion Index (CCI) score on  
6556 the Lanthony D-15 desaturated panel test among dry cleaning workers in Italy. The 35 workers made  
6557 many more mistakes in the color vision test when compared with 35 unexposed factory workers, with  
6558 most errors occurring in the blue-yellow range. Exposure to PCE was measured using passive personal  
6559 air sampling, yielding a time-weighted (8-hour) average concentration of 6 ppm (41 mg/m<sup>3</sup>) for the  
6560 workers; the mean exposure duration was 8.8 years. Vision testing was performed at the same time of  
6561 day for workers and controls by an investigator who was blinded to exposure status. When tested two  
6562 years later, color visual impairment was again significantly associated with exposure concentration  
6563 among the workers; furthermore, those workers whose exposure to PCE had increased in the two-year  
6564 interim exhibited a decline in performance from the initial testing, while performance was unchanged  
6565 among those whose exposure decreased ([Gobba et al. 1998](#)). Schreiber et al. (2002) reported diminished

6566 color discrimination or visual contrast sensitivity compared with unexposed referent groups among  
6567 small groups of children and adults living or working in a building with a co-located dry cleaning  
6568 establishment. EPA IRIS ([U.S. EPA 2012c](#)) identified potential confounders in this study, including  
6569 diagnoses of learning or developmental delays among some of the exposed children, and correlations  
6570 between exposure and children's ages and races.

6571  
6572 Only one study published after the EPA IRIS Toxicological Review ([U.S. EPA 2012c](#)) examined visual  
6573 function in humans exposed to PCE. Getz et al. ([2012](#)) measured color vision and visual contrast  
6574 sensitivity among adult residents of Cape Cod, MA who were exposed prenatally and during early  
6575 childhood to PCE-contaminated drinking water. Tests administered to the 25 exposed and 25 unexposed  
6576 subjects included the Farnsworth D-15 and Lanthony D-15d for color discrimination, as well as tests of  
6577 near acuity and near contrast sensitivity. The investigator who administered the tests was blinded to  
6578 exposure status. A statistically significant difference in color discrimination was detected using the  
6579 Farnsworth test (mean difference 0.05, 95% CI = 0.003, 0.10), but the difference observed in the  
6580 Lanthony D-15d test was not statistically significant (mean difference 0.07, 95% CI = -0.02, 0.15).  
6581 Contrast sensitivity at the highest spatial frequency test (18.0 cpd) was also diminished (mean difference  
6582 -6.47; 95% CI = -12.33, -0.62).

### 6583 *Cognition*

6584  
6585 Several occupational studies of dry cleaning employees, as well as one study of individuals residing near  
6586 dry cleaning facilities, have documented relationships between PCE exposure and adverse effects on  
6587 visuospatial memory, attention, vigilance, and information processing speed ([U.S. EPA 2012c](#)). In one  
6588 key study, a cohort of 65 dry cleaning workers in Michigan, high PCE exposure (TWA of 41 ppm or  
6589 278 mg/m<sup>3</sup>) was associated with statistically significantly ( $p < 0.01$ ) reduced scores for pattern  
6590 recognition, pattern memory, and visual reproduction tests (compared with low exposure workers whose  
6591 mean exposure was 11 ppm or 75 mg/m<sup>3</sup> ([Echeverria et al. 1995](#))). The investigations by Echeverria et al.  
6592 provided more robust evidence for the findings of Seeber et al. ([1989](#)), who reported dose-related,  
6593 statistically significant effects on the threshold for perceptual speed test, digit reproduction, digit  
6594 symbol, and cancellations among 101 German dry cleaning employees with low (8-hr TWA 12 ppm or  
6595 81 mg/m<sup>3</sup>) or high (8-hr TWA 53 ppm or 359 mg/m<sup>3</sup>) exposure to PCE (compared with 84 unexposed  
6596 controls). Of note, EPA identified several shortcomings in this study, including lack of detail on  
6597 methods used to select subjects, missing information related to testing procedures, differences in alcohol  
6598 use between exposed and control subjects that were not accounted for in the models, and nonmonotonic  
6599 dose-response relationships with some test scores. PCE exposure may also be associated with an  
6600 increase in reaction time, as reported in a study of dry cleaners ([Ferroni et al. 1992](#)).

### 6601 *Neurodegenerative diseases*

6602  
6603 Goldman et al. ([2012](#)) examined the association between Parkinson's disease and exposure to solvents  
6604 (including PCE) among discordant twin pairs. In the cohort of 99 twin pairs, each having only one twin  
6605 diagnosed with Parkinson's disease, self-reported exposure (ever exposed) to PCE was associated with a  
6606 large but very imprecise increased OR (10.5; 95% CI = 0.97, 113). Evaluation of each twin's cumulative  
6607 PCE exposure did not materially change the findings.

6608  
6609 In a retrospective cohort mortality study, Bove et al. ([2014b](#)) reported a nonsignificant elevation in the  
6610 SMR for mortality due to ALS (Amyotrophic Lateral Sclerosis; SMR = 1.14; 95% CI = 0.70, 1.74)  
6611 among PCE-exposed military personnel at Camp LeJeune (North Carolina) when compared with age,  
6612 sex, race, and calendar period-specific national mortality rates. Furthermore, the hazard ratio for ALS

mortality increased with cumulative PCE exposure category (HRs of 0.69, 1.58, and 1.96 for low [ $>1$ -155 ug/L-months], medium [ $>155 - 380$  ug/L-months], and high [ $>380$  ug/L-months] exposures, respectively) in analyses restricted to the Camp LeJeune cohort. A borderline significant ( $p=0.06$ ) positive association ( $\beta = 0.00039$ , 95% CI = -0.00002, 0.00080) was observed between cumulative PCE exposure (as a continuous variable) and ALS mortality in the cohort.

### *Neurodevelopment*

Aschengrau et al. (2016a; 2011) conducted a series of studies examining neurological outcomes of early life (prenatal and early childhood) exposure to drinking water contaminated by PCE (cumulative exposures ranging from 11 to 4668 g). Individuals residing in Cape Cod, MA were exposed to PCE leaching from water distribution pipes; a model was used to estimate individual exposures to each residence from leaching. In analyses of 831 persons with prenatal and early childhood exposure compared with 547 unexposed subjects, any exposure to PCE was associated with statistically significant increased risks of engaging in risky behaviors (Aschengrau et al. 2016a). Analyses included adjustment for demographic characteristics, key risk factors for the behavioral and health outcomes under study, and nondrinking water sources of solvent exposure. Odds ratios for use of more than one major illicit drug (crack/cocaine, psychedelics, heroin, Ritalin without a prescription, and club/designer drugs) in the highest exposure groups were 1.6 (95% CI = 1.2, 2.2) for use during adolescence and 1.5 (95% CI = 1.2, 1.9) for use during adulthood. Early and heavy smoking, and frequent or heavy drinking behaviors were also increased among highly exposed subjects (ORs 1.3-1.6, with statistically significantly increased ORs for drinking, but not smoking patterns). In the same population, a significant increased risk was observed for development of bipolar disorder among highly exposed ( $\geq 67$ th percentile) subjects (RR = 2.7, 95% CI = 1.3, 5.6). Nonsignificant increased RRs were also seen for post-traumatic stress disorder (1.7, 95% CI = 0.9, 3.2 for exposure  $\geq 67$ th percentile) and schizophrenia (2.1; 95% CI = 0.2, 20.0 for any vs. no exposure, based on 3 cases; (Aschengrau et al. 2016a).

Neuropsychological findings in a subset of the Aschengrau et al. cohort (35 exposed and 28 unexposed adults) who were willing to undergo testing showed modest, nonsignificant differences in performance on tests for visuospatial function, learning and memory, mood alteration, and attention and executive function (mean differences of -0.2 or - 0.3, with confidence intervals in the range of -0.5 to +0.1 or -0.6 to +0.1; (Aschengrau et al. 2016a). The largest magnitude of difference was observed for motor functioning (mean difference in the finger tapping test was -1.8), but the difference was imprecise (95% CI = -5.7 to +2.2). Other studies within the cohort evaluated whether PCE exposure was associated with altered brain MRI findings in a subset of the cohort (26 exposed and 16 unexposed adult subjects). There were no significant differences in MRI findings (e.g., white and gray matter volumes and white matter hypointensities) between the groups. Postulating that neurological sequelae of early PCE exposure could increase the likelihood of unintentional head injuries, Aschengrau et al. (2016b) evaluated the frequency of self-reported head injuries among members of the cohort (828 exposed and 544 unexposed). No increase in the risk of head injuries was observed for any exposure, or in the highest exposure group (RRs 0.8-1.0).

Stingone et al. (2016) evaluated the relationship between standardized test scores in math and English language arts among 3rd graders in New York City schools and modeled air concentrations of PCE (median concentration 0.68  $\mu\text{g}/\text{m}^3$ ) and diesel particulate matter from EPA's National Air Toxics Assessment (NATA) in 1996 (assessment closest to the children's birth years) to correspond with the mothers address at time of birth. Prenatal exposure to PCE in the highest quartile was associated with lower math test scores and increased risk of failing to meet test standards for math (1.03 95% CI = 1.00,



1.06). In analyses of English language arts test results, prenatal PCE exposure was associated with decreased test scores only in the upper tail of the distribution of test scores (75th quantile and above); there was no association with failure to meet test standards. Due to the use of an exposure model based on census tract data and uncertainties surrounding the actual location of mothers during pregnancy, there was potential for exposure misclassification.

Four case-control studies of autism spectrum disorders (ASD) and prenatal exposure to hazardous air pollutants, including PCE, were identified in the literature searches ([Talbot et al. 2015](#); [von Ehrenstein et al. 2014](#); [Roberts et al. 2013](#); [Kalkbrenner et al. 2010](#)). Three of the studies used modeled air concentrations of toxicants at the place of maternal or birth residence based on EPA's NATA, while von Ehrenstein et al. (2014) used measured air concentrations from monitoring stations within 5 km of the subjects' residences (Los Angeles County CA). Two studies ([Roberts et al. 2013](#)) and ([von Ehrenstein et al. 2014](#)) reported significant positive associations between the odds of ASD and PCE exposure. Roberts et al. (2013) reported an OR of 1.60 (95% CI = 1.07, 2.41) comparing the highest to lowest quintiles of PCE exposure in a case-control study nested within the Nurses' Health Study II. In the study by von Ehrenstein et al. (2014), significantly increased ORs were observed for an interquartile range increase in exposure concentration across the pregnancy (OR = 1.40, 95% CI = 1.09, 1.80 for stations within 5 km of the residence and OR = 1.61, 95% CI = 1.14, 2.26 for stations within 3.5 km). Stratification by ASD severity and by gender showed stronger associations for milder ASD and in males. Kalkbrenner et al. (2010) and Talbot et al. (2015) did not report significant associations between ASD and PCE exposure in case control studies in NC and WV or PA (respectively).

### ***Clinical Signs of Neurotoxicity***

Lucas et al. (2015) observed no significant differences ( $p \geq 0.01$ ) in the prevalence of self-reported symptoms of neurotoxicity (e.g., fatigue at end of day, difficulty sleeping) when comparing 50 dry cleaning workers with exposure to PCE with symptoms reported by 95 workers who were not exposed. The median airborne concentration of PCE was 7 ppm (47 mg/m<sup>3</sup>) (range 0.22-33 ppm) in the dry cleaning establishments, and workers had blood levels of PCE ranging between 11.8 and 544 µg/L (median 73.6 µg/L).

### ***Animal Evidence***

Animal studies provide support for the effects seen in humans, but the database is much more limited. Effects recorded in studies of rats, mice, and gerbils include clinical signs of neurotoxicity, neurophysiological changes, and alterations in brain chemistry or brain weight ([ATSDR 2019](#); [U.S. EPA 2012c](#)). Other studies reported decreases in brain fatty acid and DNA content, alterations in taurine and glutamine content, and decreased brain weight in gerbils and impaired nociception in rats ([U.S. EPA 2012c](#)).

Limited information is reasonably available on developmental neurotoxicity in animals exposed to PCE, however existing data suggests that gestational exposure can impair neurobehavior, motor performance, and neurotransmitter signaling ([U.S. EPA 2012c](#)).

No studies examining sensitive neurological endpoints in adult animals were published after the EPA IRIS Toxicological Review ([U.S. EPA 2012c](#)). No clinical signs of neurotoxicity were noted in female Sprague-Dawley rats exposed to PCE concentrations up to 1000 ppm (6783 mg/m<sup>3</sup>) for four weeks in a study focused on immunotoxicity ([Boverhof et al. 2013](#)).

### 3.2.3.1.3 Kidney Toxicity

#### Human Evidence

Most of the available epidemiological studies, conducted in populations of dry cleaning workers, examined markers of kidney toxicity without including standard tests for kidney function ([U.S. EPA 2012c](#); [Mutti et al. 1992](#)). Based on the observed increases in urinary RBP,  $\beta$ 2-glucuronidase, lysozyme, and glutamine synthetase, EPA believes that PCE has its primary effect on the proximal tubules, as these are markers of proximal tubular injury. Other markers of tubular injury, including N-acetyl glucuronidase (NAG) and alanine aminopeptidase (AAP) were not associated with exposure ([U.S. EPA 2012c](#)), however NAG is a relatively insensitive measure of tubular dysfunction, and AAP was assessed in only one study. One epidemiological study published after the EPA IRIS Toxicological Review ([U.S. EPA 2012c](#)) examined non-cancer renal toxicity and found that PCE was not significantly associated with chronic renal diseases ([Silver et al. 2014](#)).

#### Animal evidence

Animals exposed to PCE by inhalation exhibit renal effects such as increased kidney weights, and tubular histopathology ([ATSDR 2019](#); [U.S. EPA 2012c](#)). Effects have been reported in both male and female rats and male and female mice. In a multigeneration study of Alpk:APfSD rats exposed for ~19 weeks, renal effects including minimal chronic progressive glomerulonephropathy and increased pleomorphism in proximal tubular nuclei were seen at 1000 ppm (6783 mg/m<sup>3</sup>; the highest concentration tested) ([Tinston 1994](#)). With two years of exposure to 200 ppm (1357 mg/m<sup>3</sup>), male and female rats showed increased relative kidney weights and karyomegaly of the proximal tubules ([JISA 1993](#); [NTP 1986b](#)). In a four-week immunotoxicity study published after the EPA IRIS Toxicological Review ([U.S. EPA 2012c](#)), no changes in kidney weight or histology were observed in female Sprague-Dawley rats exposed by whole-body inhalation to PCE concentrations up to 1000 ppm (6783 mg/m<sup>3</sup>; ([Boverhof et al. 2013](#))).

Mice exposed to 609 ppm (4131 mg/m<sup>3</sup>) for 13 weeks exhibited histopathology changes (not further described) in the proximal tubules; at 200 ppm (1357 mg/m<sup>3</sup>) for 13 weeks, karyomegaly of the renal tubular epithelial cells was observed ([JISA 1993](#); [NTP 1986b](#)). Chronic (2 years) inhalation exposure resulted in nephrosis (karyomegaly and cytomegaly of the proximal tubules) in both sexes of B6C3F1 mice exposed to 100 ppm (678 mg/m<sup>3</sup>; the lowest concentration tested) ([NTP 1986b](#)) and karyomegaly with atypical dilation of the proximal tubules in male and female hybrid mice exposed to 250 ppm (1696 mg/m<sup>3</sup>; ([JISA 1993](#))).

After 78 weeks of exposure to doses  $\geq 386$  mg/kg-day (mice) or  $\geq 475$  mg/kg-day (rats) administered by gavage in corn oil, both sexes of Osborne-Mendel rats and B6C3F1 mice exhibited toxic nephropathy, with higher incidences in rats than mice ([NCI 1977](#)). Mixed evidence including both positive and negative findings for signs of kidney toxicity were observed in other mice studies ([U.S. EPA 2012c](#)), while increased kidney weight, urinary markers of damage, and histopathology was reported in rats ([Jonker et al. 1996](#)).

A group of studies in F344 rats showed accumulation of  $\alpha$ 2u-globulin and hyaline droplets in the proximal tubules of male rats exposed to PCE by gavage in corn oil for 10 days to four weeks ([U.S. EPA 2012c](#)). These changes were correlated with cell proliferation, formation of granular tubular casts, and tubular cell regeneration, suggesting the involvement of male rat-specific  $\alpha$ 2u-globulin accumulation in the mode of action for some renal effects of PCE. However, the kidney effects seen in female rats and in mice of both sexes show that other mechanisms (e.g., peroxisome proliferation and/or cytotoxicity

6753 mediated by reactive metabolites produced from glutathione conjugation in the kidney; see Section  
6754 3.2.3.2.4) also play a role in the renal toxicity of this compound.

#### 6755 **3.2.3.1.4 Liver Toxicity**

---

##### 6756 **Human evidence**

6757 There is limited information on the hepatic effects of PCE in humans, with conflicting evidence across  
6758 several occupational studies of dry cleaning workers. Sonographic changes in the liver and alterations in  
6759 hepatic enzyme levels in serum (compared with unexposed workers) were noted in two studies of dry  
6760 cleaners with exposure to PCE; however other studies noted no differences in enzyme levels ([U.S. EPA  
6761 2012c](#)). Exposure levels in the negative studies were comparable to those in the ones reporting effects,  
6762 but workers in the studies reporting effects had been exposed for much longer (12-20 yrs vs 3-6 yrs in  
6763 negative studies. In Silver et al. (2014), the only human study of PCE published after EPA IRIS ([U.S.  
6764 EPA 2012c](#)) that examined noncancer liver effects, there was a statistically significant deficit of  
6765 cirrhosis and chronic liver disease in male workers at a microelectronics and business machine facility.  
6766

##### 6767 **Animal evidence**

6768 Liver toxicity (i.e., necrosis, vacuolation, etc) has been reported in multiple animal species by inhalation  
6769 and oral exposures to PCE, with the mouse typically being more sensitive than the rat. The liver effects  
6770 are characterized by increased liver weight, necrosis, inflammatory cell infiltration, triglyceride  
6771 increases proliferation, cytoplasmic vacuolation (fatty changes), pigment in cells, oval cell hyperplasia  
6772 and regenerative cellular foci ([U.S. EPA 2012c](#)).  
6773

6774 In mice exposed to PCE by oral gavage, increased serum ALT levels, increased liver weight,  
6775 hepatocellular hypertrophy, fatty degeneration and necrosis, and regenerative repair/increased DNA  
6776 synthesis were observed after exposure to doses of 20 - 2000 mg/kg-day for 6 weeks ([Buben and  
6777 O'Flaherty 1985](#)). Rats exposed orally to 600 or 2,400 mg/kg-day PCE for 32 days showed increased  
6778 relative liver weight as well ([Jonker et al. 1996](#)). In inhalation studies of PCE, both mice and rats  
6779 exhibited hepatic effects, but mice appear to be more sensitive. Mice displayed increases in palmitoyl  
6780 CoA, peroxisome proliferation, mitochondrial proliferation, increased relative weight, centrilobular lipid  
6781 accumulation/fatty degeneration, and liver necrosis/degeneration. Effects observed in rats were limited  
6782 to increased liver weight after subchronic exposure and spongiosis hepatitis and hyperplasia following  
6783 chronic exposure ([U.S. EPA 2012c](#)). In rats, increased liver weight was observed after 90 days of  
6784 continuous exposure, while spongiosis hepatitis and hyperplasia were noted to occur at increased  
6785 incidences after 110 weeks of exposure ([U.S. EPA 2012c](#); [JISA 1993](#)).  
6786

6787 A four-week inhalation immunotoxicity study in rats ([Boverhof et al. 2013](#)) that was published after  
6788 EPA IRIS ([U.S. EPA 2012c](#)) also reported hepatic effects. Female Sprague-Dawley exposed whole-  
6789 body to 1000 ppm (6783 mg/m<sup>3</sup>) exhibited increased relative liver weights (in conjunction with  
6790 decreased body weight at this exposure level) and an increased incidence of centrilobular hepatocellular  
6791 hypertrophy. At lower exposure levels, no biologically significant hepatic effects were noted.

#### 6792 **3.2.3.1.5 Reproductive/Developmental Toxicity**

---

6793 The EPA IRIS Assessment for PCE ([U.S. EPA 2012c](#)) evaluated the developmental and reproductive  
6794 toxicity of PCE in humans and animals.  
6795

##### 6796 **Human evidence**

##### 6797 **Reproductive**

6798 Studies of PCE exposure in humans have evaluated several reproductive outcomes including effects on  
6799 menstrual disorders, semen quality, fertility, time to pregnancy, and risk of adverse pregnancy outcomes  
6800 including spontaneous abortion, low birth weight or gestational age, birth anomalies, and stillbirth ([U.S.  
6801 EPA 2012c](#)).

6802  
6803 Sperm concentration, morphology and motility were examined in California men who worked as dry  
6804 cleaners (n = 34) compared with aged matched laundry workers (n= 48) ([Eskenazi et al. 1991](#)). The  
6805 three measures of exposure in this study were dry cleaners vs. laundry workers, exhaled breath  
6806 concentrations of PCE and an exposure score assigned by an industrial hygienist. Clinically relevant  
6807 changes in sperm concentration, morphology and motility were not associated with any measure of PCE  
6808 exposure. Fertility rates were examined among wives of dry cleaners and laundry workers in this study;  
6809 however, the small sample size in this study precluded a determination of findings.

6810  
6811 The potential association between PCE exposure and time to pregnancy was evaluated in several studies  
6812 including a Danish case-control study of couples treated for infertility, a retrospective time-to-pregnancy  
6813 study in Finnish women, and a Finnish case-control study ([U.S. EPA 2012c](#)). Some evidence of an  
6814 association was identified in these studies, however the presence of confounders, absence of PCE-  
6815 specific data in all values, and possibility of bias diminish the impact of the results.

#### 6816 6817 *Developmental*

6818 The epidemiological evidence for developmental effects associated with PCE exposure is suggestive  
6819 based on several studies of maternal occupational exposure to PCE that suggest an increased risk of  
6820 spontaneous abortion at high concentrations ([Olsen et al. 1990](#); [Kyyronen et al. 1989](#)). In addition,  
6821 drinking water studies have suggested associations between PCE exposure and pre-term birth, low birth  
6822 weight, eye and ear anomalies, and oral cleft defects ([U.S. EPA 2012c](#)).

#### 6823 6824 **Animal evidence**

6825 Data from animal studies identified various manifestations of developmental toxicity including  
6826 increased mortality and decreased body weight in the offspring of rodents exposed via inhalation.

#### 6827 6828 *Reproductive*

6829 A multi-generation study ([Tinston 1994](#)) exposed rats to 0, 100, 300, or 1,000 ppm (0, 678, 2035, 6783  
6830 mg/m<sup>3</sup>) PCE, 6 hours/day, 5 days/week, for 11 weeks prior to mating and then for 6 hours/day during  
6831 mating and through GD 20. First generation dams and litters were exposed from PND 6 through PND 29  
6832 but were not exposed from GD 21 through PND 5. This study did not evaluate estrous cyclicity, sperm  
6833 parameters, age to sexual maturation or enhanced reproductive organ histopathology. The only  
6834 significant reproductive effect reported in this study was reduced testes weight in F1A and F1 males at  
6835 1000 ppm (6783 mg/m<sup>3</sup>). Sperm abnormalities were not observed in rats exposed to 100 or 500 ppm  
6836 (678 or 3391 mg/m<sup>3</sup>), 7 hours/day for 5 days (measured at 1, 4 and 10 weeks after the last exposure).  
6837 Sperm head abnormalities were increased in mice exposed to 500 ppm (3391 mg/m<sup>3</sup>) PCE at 4 weeks  
6838 only ([Beliles et al. 1980](#)). The temporal pattern of this effect suggests that spermatocytes and/or  
6839 spermatogonia may be sensitive to PCE exposure. Female reproductive toxicity was also observed based  
6840 on reduced fertilization of oocytes from exposed female rats ([U.S. EPA 2012c](#)).

#### 6841 6842 *Developmental*

6843 Animals studies generally support the findings from the epidemiological literature for developmental  
6844 effects associated with PCE. Inhalation exposure to PCE resulted in increases in pre- and post-

6845 implantation losses, increased incidence of total malformations, decreased fetal weight, increased  
6846 incidence of skeletal retardations or delayed ossification, and/or decreased postnatal survival in rats  
6847 ([U.S. EPA 2012c](#); [Carney et al. 2006](#)), increased incidence of visceral malformations or decreased fetal  
6848 weight and delayed ossification in mice, and increases in abortions, total litter resorptions, post-  
6849 implantation losses, and the incidence of malformations in rabbits ([U.S. EPA 2012c](#)).

### 6850 **3.2.3.1.6 Immune System and Hematological Effects**

#### 6851 **Immune System Effects**

##### 6852 *Human Evidence*

6853 The association between PCE exposure and alterations in lymphocyte subpopulations, immunoglobulin  
6854 and cytokine levels, and other markers of inflammation has been indicated in dry cleaning workers and  
6855 in children in Germany. Studies of the relationship between serum cytokine and IgE levels in infants or  
6856 toddlers and volatile organic compounds in the children's bedroom air reported no association with IgE  
6857 but did report reduced interferon- $\gamma$  levels for PCE exposure above the 75<sup>th</sup> percentile ([U.S. EPA 2012c](#)).  
6858 No relevant studies were identified that were published after the EPA IRIS Assessment ([U.S. EPA](#)  
6859 [2012c](#)).

6860  
6861 There is conflicting data on whether there is a link between increasing PCE exposure and asthma  
6862 symptoms. While there is limited evidence of exacerbation of asthma symptoms, other data found no  
6863 association with either ambient or exhaled concentrations after adjustment for co-exposure to criteria  
6864 pollutants ([U.S. EPA 2012c](#)).

6865  
6866 A number of studies have been conducted to evaluate the potential link between systemic autoimmune  
6867 conditions and exposure to solvents as a category, however limited data is available to evaluate whether  
6868 PCE exposure alone is associated with these conditions. Case reports and population based studies have  
6869 examined incidences of sclerosis, localized scleroderma, rheumatoid arthritis, and other conditions  
6870 without any statistically significant associations obtained ([U.S. EPA 2012c](#)).

##### 6871 6872 *Animal Evidence*

6873 There is conflicting limited data from animal studies concerning effects on the immune organs of  
6874 thymus and spleen ([U.S. EPA 2012c](#)). Two animal studies published after EPA IRIS ([U.S. EPA 2012c](#))  
6875 examined immune system effects ([Boverhof et al. 2013](#); [Seo et al. 2012](#)). Seo et al. (2012) evaluated  
6876 potential immune adjuvant effects of PCE in ICR mice exposed to 0.01 and 1 mg/L in drinking water for  
6877 2 or 4 weeks. Twenty-four hours before assessment (at 2 or 4 weeks), mice were sensitized by  
6878 intradermal injection with anti-dinitrophenol (DNP) IgE antibody. At assessment, mice were challenged  
6879 with a solution of Evans blue and anti-DNP IgE antibody via intravenous injection; after 30 minutes, the  
6880 passive cutaneous anaphylaxis (PCA) reaction was measured by removal of skin dyed blue and  
6881 quantification of pigment. The PCA reaction was significantly increased at 0.01 and 1 mg/L by 2.1- and  
6882 2.4-fold, respectively, at 4 weeks. No significant immune adjuvant effect was observed at 2 weeks.

6883  
6884 Boverhof et al. (2013) did not observe immunotoxicity effects in female Sprague-Dawley rats  
6885 (16/group) exposed whole-body to PCE concentrations up to 1000 ppm (6783 mg/m<sup>3</sup>) for 4 weeks (6  
6886 hours/day, 5 days/week). No exposure-related changes were noted in total protein concentration, LDH  
6887 enzyme activity, or leukocyte differential cell distribution in bronchoalveolar lavage fluid. In addition,  
6888 treatment did not alter the number of spleen cells, or spleen or thymus weight or histology, and there  
6889 were no treatment-related changes in immune reaction in the SRBC antigen assay.

6890

## 6891 **Hematological Effects**

### 6892 *Human Evidence*

6893 In a single study, decreased erythrocyte counts and hemoglobin levels and increased total white cell and  
6894 lymphocyte counts were indicated in PCE-exposed dry cleaning workers ([U.S. EPA 2012c](#)). Among  
6895 human studies published after the EPA IRIS Toxicological Review ([U.S. EPA 2012c](#)), no information  
6896 pertaining to hematological effects was identified.

6897

### 6898 *Animal Evidence*

6899 Animal studies showing effects on hematological parameters are restricted to mice with evidence of  
6900 diminished erythropoiesis and increased leukocytes ([U.S. EPA 2012c](#)). PCE exposure resulted exhibited  
6901 a temporal increase in reticulocytes and a small reduction in erythroid committed cells in the bone  
6902 marrow as well as increased spleen weight with hemosiderin deposits and red pulp congestion and  
6903 increased serum LDH isozyme I ([ATSDR 2019](#)). When NMRI mice were exposed to PCE in drinking  
6904 water for 7 weeks starting at 2 weeks of age, Hemolytic anemia with evidence of splenic involvement  
6905 was observed in mice, with no evidence that hepatic toxicity contributed to the effect ([U.S. EPA 2012c](#)).

6906

6907 Hematologic effects were not reported in rat studies reviewed by EPA IRIS ([U.S. EPA 2012c](#)). In the 4-  
6908 week rat study by Boverhof et al. ([2013](#)) that was published after the EPA IRIS Toxicological Review  
6909 ([U.S. EPA 2012c](#)), no exposure-related changes to hematological parameters were observed at exposure  
6910 concentrations up to 1000 ppm (6800 mg/m<sup>3</sup>).

## 6911 **3.2.3.2 Genotoxicity and Cancer Hazards**

6912 EPA has identified several human studies published subsequent to the 2012 IRIS assessment of PCE and  
6913 has evaluated these studies as well as key and supporting studies from the IRIS assessment ([U.S. EPA](#)  
6914 [2012c](#)) according to the data quality criteria published in ([U.S. EPA 2018b](#)). The key and supporting  
6915 studies that were evaluated include the studies that were considered for dose-response modeling and  
6916 heavily considered in the overall IRIS assessment ([U.S. EPA 2012c](#)). The full list of studies evaluated  
6917 for data quality is identified in the supplemental file *Draft Risk Evaluation for Perchloroethylene*  
6918 *Systematic Review Supplemental File: Data Quality Evaluation of Human Health Hazard Studies –*  
6919 *Animal Studies* ([U.S. EPA 2020l](#)).

6920 A summary of genotoxicity studies is also included here. Note that EPA has not re-evaluated  
6921 genotoxicity studies for quality but is relying on previous assessments, such as the IRIS assessment  
6922 conclusions. A discussion of these studies follows.

### 6923 **3.2.3.2.1 Genotoxicity**

6924 ([U.S. EPA 2012c](#)), ([IARC 2014](#)), and ([ATSDR 2019](#)) provide comprehensive reviews on the  
6925 genotoxicity of PCE. The discussion of PCE genotoxicity here is based on these previous assessments,  
6926 supplemented by information from a few individual genotoxicity studies ([Everatt et al. 2013](#); [Irving and](#)  
6927 [Elfarra 2013](#); [Tucker et al. 2011](#)).

### 6928 *In vivo human*

6929 A handful of cross-sectional studies evaluating genotoxicity endpoints in exposed workers suggested  
6930 that PCE may induce increases in micronuclei and DNA damage. Significant increases in the frequency  
6931 of micronuclei and in DNA damage (mean tail length by comet assay) were observed in human  
6932 lymphocytes from dry cleaning workers ([Everatt et al. 2013](#)). The frequency of chromosomal  
6933 aberrations was not significantly different between workers and controls, but regression analysis of these  
6934 results in the exposed group showed significant positive associations with PCE exposure duration and

6935 frequency ([Everatt et al. 2013](#)). A recent study by Azimi et al. [published after the conclusion of the](#)  
6936 [TSCA literature search](#) (as cited in ([ATSDR 2019](#))) provided some support for the finding of DNA  
6937 damage reported by ([Everatt et al. 2013](#)). Azimi et al. observed significant increases in comet assay tail  
6938 length, percent DNA in tail, and tail moment in 33 dry cleaners employed for at least 3 months (median  
6939 duration 8 years), when compared with 26 controls; exposure levels were not reported. ([Tucker et al.](#)  
6940 [2011](#)) observed statistically significant increases in the frequencies of acentric fragments and in a group  
6941 of dry cleaning workers exposed for at least 1 year compared to controls, but no statistically significant  
6942 difference was observed for chromosomal translocations. A previous study of these subjects reported  
6943 reductions in oxidative DNA damage in leukocytes from exposed workers compared with controls, and  
6944 there was no statistically significant increase in sister chromatid exchanges observed in studies on  
6945 workers compared to ONUs or controls ([U.S. EPA 2012c](#)).

### 6946 ***In vivo animal***

6947 Few in vivo animal studies of PCE genotoxicity have been performed, and the results of the available  
6948 studies are inconclusive. A marginal but dose-related increase in DNA damage, as measured by comet  
6949 assay tail intensity, was reported to occur in hepatocytes, but not kidney cells of mice given PCE orally  
6950 and the significance of this results has been questioned ([U.S. EPA 2012c](#)). In an earlier study, single  
6951 strand DNA breaks were reported in mouse liver and kidney (but not lung) after intraperitoneal injection  
6952 of PCE, but the observed effect was no longer apparent after 24 hours. No DNA strand breaks were  
6953 observed in the kidneys of male rats given PCE orally for a week. No increase in oxidative DNA  
6954 damage was reported in urine, lymphocytes, or liver of rats exposed by intraperitoneal injection, but  
6955 there was significant morbidity and mortality among the animals at the higher doses ([U.S. EPA 2012c](#)).

6956 In one study investigating micronucleus induction, no increase in the frequency of micronuclei was  
6957 observed in reticulocytes or hepatocytes after intraperitoneal injection of PCE before partial  
6958 hepatectomy, while an increase in micronuclei was seen in hepatocytes when treatment occurred after  
6959 partial hepatectomy ([ATSDR 2019](#)). Examinations for DNA binding in rats and mice after  
6960 intraperitoneal exposure to radiolabelled PCE showed DNA labelling in mouse liver and stomach and, at  
6961 lower levels, in mouse kidney and rat stomach. An earlier study using a less sensitive method showed no  
6962 DNA binding in mouse liver after oral or inhalation exposure ([U.S. EPA 2012c](#)).

### 6963 ***In vitro mutagenicity***

6964 A test for gene mutations in mouse lymphoma L5178Y cells was negative both with and without  
6965 metabolic activation ([U.S. EPA 2012c](#)). In vitro non-mammalian testing for mutagenicity suggests that  
6966 PCE itself is not mutagenic, in contrast to some oxidative and conjugated metabolites of PCE. PCE has  
6967 been extensively tested for forward and reverse mutations in *Salmonella typhimurium*, *Escherichia coli*,  
6968 and *Saccharomyces cerevisiae*, both with and without metabolic activation. In the preponderance of  
6969 tests, the results were unequivocally negative, except for one strong exception ([ATSDR 2019](#); [IARC](#)  
6970 [2014](#); [U.S. EPA 2012d](#)).

6971 In that exception study, a clear positive response was observed in *S typhimurium* TA100 with metabolic  
6972 activation and supplied glutathione (GSH), with an even stronger response when purified GSH S-  
6973 transferase was also added. These results suggest that metabolites of PCE in the glutathione conjugation  
6974 pathway are mutagenic. Support for this finding is seen in testing of PCE metabolites for mutagenicity.  
6975 Ames testing of TCVG yielded positive results with metabolic activation, and equivocal or negative  
6976 results without activation ([U.S. EPA 2012c](#)). However, positive results were observed in Ames testing of  
6977 TCVC ([U.S. EPA 2012c](#)), NAcTCVC (N-acetylated TCVC) ([U.S. EPA 2012c](#)), and TCVC sulfoxide  
6978 ([Irving and Elfarrar 2013](#)) without metabolic activation. The mutagenicity of NAcTCVC in *Salmonella* is

6979 believed to result from bacterial deacetylation to TCVC ([U.S. EPA 2012c](#)). Irving et al. (2013) showed  
6980 that TCVC was a more potent mutagen than TCVC sulfoxide, but concluded that the latter was a  
6981 definite, albeit weak, mutagen.

6982 Oxidative metabolites of PCE have also shown some evidence for mutagenic activity. Trichloroacetyl  
6983 chloride exposure increased revertants in *S. typhimurium* TA100 with or without activation in one study  
6984 but not in another ([U.S. EPA 2012c](#)). In addition, PCE oxide was positive for reverse mutations in *S.*  
6985 *typhimurium* TA1535 without activation, but not in *E. coli* WP2uvrA. Testing of the oxidative  
6986 metabolite trichloroacetic acid (TCA), is ambiguous because interpretation of TCA in vitro test results is  
6987 complicated by pH changes induced by the compound ([U.S. EPA 2012c](#)).

6988 PCE has been tested for gene conversion, mitotic combination, and reverse mutation in *S. cerevisiae*.  
6989 Positive results were observed only when log-phase cultures, in which xenobiotic metabolism is  
6990 stimulated, were used. When stationary cultures were used, exposure did not induce gene conversion,  
6991 mitotic combination, or reverse mutation ([IARC 2014](#)). In growing cells of the D61.M strain, PCE  
6992 exposure, both with or without metabolic activation, induced aneuploidy ([IARC 2014](#)). No evidence for  
6993 sex-linked recessive lethal mutations was observed in tests of *Drosophila melanogaster* exposed to PCE  
6994 by feeding, inhalation, or injection ([U.S. EPA 2012c](#)).

#### 6995 ***In vitro* Micronuclei, SCEs and Chromosomal Aberrations**

6996 In mammalian cell systems tested in vitro, no evidence for SCEs or chromosomal aberrations was  
6997 observed in Chinese hamster ovary cells, Chinese hamster lung cells, or human lymphocytes. Assays for  
6998 induction of micronuclei in vitro yielded mixed results. Induction of micronuclei were reported in  
6999 Chinese hamster ovary cells exposed to PCE without metabolic activation, but not in Chinese hamster  
7000 lung cells. Experiments in metabolically enhanced cells yielded positive results for micronucleus  
7001 induction. Increases in micronuclei were seen in human AHH-1 lymphoblastoid cells (which have high  
7002 GST activity) and in daughter cell lines that express human CYP2E1 (h2E1 cells) or CYPs 1A2, 2A6,  
7003 3A4, 2E1, and microsomal epoxide hydrolase (MCL-5 cells) ([U.S. EPA 2012c](#)).

#### 7004 ***In vitro* DNA damage and morphological cell transformation**

7005 Few experiments examining DNA damage in cell systems in vitro after exposure to PCE have been  
7006 performed. Equivocal results were reported in tests of human WI38 fibroblasts for unscheduled DNA  
7007 synthesis: low doses yielded results comparable to the positive control, while high doses were negative,  
7008 although the positive control response was weak and cytotoxicity was observed at high doses ([U.S. EPA](#)  
7009 [2012c](#)). In other studies of unscheduled DNA synthesis in rat and mouse hepatocytes and human  
7010 lymphocytes and fibroblasts, PCE did not yield positive results ([U.S. EPA 2012c](#)). A more recent study  
7011 reported no increase in 8-OHdG (a measure of oxidative DNA damage) or  $\gamma$ -H2AX levels (indicative of  
7012 double strand DNA breaks) in HepG2 cells exposed to PCE ([Deferme et al. 2015](#)); however, the  
7013 capacity of HepG2 cells to metabolize PCE is unknown.

7014 PCE exposure resulted in morphological cell transformation when RLV/Fischer rat embryo cells were  
7015 exposed for 2 days, but not when BALB/c-3T3 cells were exposed for 3 days followed by a 30-day  
7016 incubation period ([U.S. EPA 2012c](#)).

#### 7017 **3.2.3.2.2 Carcinogenicity Epidemiological Studies**

7018 ([U.S. EPA 2012c](#)) performed a thorough review of the epidemiological data pertaining to  
7019 carcinogenicity of PCE available from studies conducted through 2011. This review concluded that there  
7020 was a pattern of evidence associating PCE exposure with several types of cancer, specifically bladder



7021 cancer, non-Hodgkin's lymphoma (NHL), and multiple myeloma (MM), and that more limited data  
7022 supporting a suggestive effect were available for cancer at other sites, including esophageal, kidney,  
7023 lung, liver, cervical, and breast cancer.

7024  
7025 Descriptions of the data supporting these conclusions can be found in the IRIS Toxicological Review for  
7026 PCE ([U.S. EPA 2012c](#)). Newer epidemiological studies not available at the time of the IRIS review are  
7027 summarized in Table 3-3 along with the outcome of EPA's data quality evaluation ([U.S. EPA 2020k](#)). A  
7028 detailed description of all epidemiological data can be found in Appendix 5.3.68F.1.11.  
7029

Table 3-3. Summaries of Newer Epidemiologic Cancer Studies Published after the 2012 IRIS Toxicological Review

Outcome/Endpoint	Study Population	Exposure	Results	Reference	Data Quality Evaluation
Cause-specific mortality: kidney cancer, Hodgkin's lymphoma, Leukemias, ALS	Camp Lejeune, North Carolina cohort; n=154,932 median age, start of follow-up: 20 median age, end of follow-up: 49 Camp Pendleton, California cohort n=154,969 median age, start of follow-up: 20 median age, end of follow-up: 49 exposure period: 1975-1985; mortality follow-up period: 1979-2008	Chemical name: Tetrachloroethylene (PCE); exposure matrix: estimated monthly average PCE concentration in Tarawa Terrace water system (1975-1985) Mean: 75.7 ug/L, Median: 84.9 ug/L, Range: 0-158.1 ug/L; estimated monthly average PCE concentration in Hadnot Point water system (1975-1985) Mean: 15.7 ug/L, Median: 15.4 ug/L, Range: 0-38.7 ug/L); Duration: On average an individual in the Camp Lejeune cohort resided at the base for 18 months.	Positive, non-significant associations observed between cumulative exposure to PCE and mortality due to kidney cancer.	<a href="#">(Bove et al. 2014b)</a>	High
Diffuse large B-cell lymphoma	Georgia population (2000 census)	Geocoded toxic release sites data for Perc from 1988-1998 EPA's TRI	Significantly decreased risk for diffuse large B-cell lymphoma with increasing mean distance (per 1 mile) to Perc TRI sites.	<a href="#">(Bulka et al. 2016)</a>	Medium
Mortality from lymphatic and haematopoietic cancer	1704 dry cleaning workers in four US cities (San Francisco/Oakland, Chicago, Detroit, and New York)	Employment in a shop using Perc, mean (sd) years of employment for exposed workers 6.2 (5.0)	Significant elevated SMRs were observed for all cancers, esophageal cancer, and trachea, bronchus, and lung cancer. SMRs were significantly lower for liver cancer. No significant association was found for kidney cancer, lymphatic and haematopoietic cancer, and bladder cancer.	<a href="#">(Calvert et al. 2011)</a>	Medium

Outcome/ Endpoint	Study Population	Exposure	Results	Reference	Data Quality Evaluation
Diagnosis of cancer in oral cavity, oropharynx, hypopharynx, oral cavity, and larynx (detailed list of codes in text)	Case-control, women only, 296 cases, 775 controls, diagnosed 2001-2007, general population, 18-85 years, subset of ICARE cohort	Perc, exposure qualitatively stated, modeled as cumulative exposure index (CEI)	Statistically significant positive association between Perc and head/neck cancers in ever/never analysis; null association in continuous cumulative exposure assessment	<a href="#">(Carton et al. 2017)</a>	Medium
Cancers of the bladder, prostate, colon, stomach, rectum, kidney, pancreas, esophagus, and liver, as well as melanoma and non-Hodgkin's lymphoma.	3730 male, Canadian patients aged 35 to 70 years diagnosed 1979-1985 in 18 largest Montreal hospitals; 533 controls from electoral lists in Quebec. A second control group consisted of the population controls together with patients with cancers at sites distal to the primary cancer being assessed.	PERC exposure determined from self-reported job history categorized by chemists and industrial hygienists based on degree of confidence, frequency, and relative levels (not quantitative)	Significant increase in the OR for prostate cancer associated with Perc exposure (substantial), non-significant OR for all other cancers	<a href="#">(Christensen et al. 2013)</a>	Medium
Breast cancer incidence	920 incident breast cancer cases, 1293 controls, Cape Cod, Massachusetts, 1983-1993,	Water distribution modeled exposure to Perc-lined public water distribution pipelines	Perc was not significantly associated with breast cancer, but there was a modest increase in risk in women with high perc exposure	<a href="#">(Gallagher et al. 2011)</a>	Medium
Bladder cancer	113,343 cases and 566,715 matched controls from the Nordic Occupational Cancer (NOCCA) project (through 2005)	Perc exposure estimated via linkage between occupational codes and Nordic Occupational Cancer (NOCCA) project job exposure matrix (JEM)	No significant trend in risk with increasing Perc exposure, significant increase in hazard ratio was only observed in the mid exposure group	<a href="#">(Hadkhale et al. 2017)</a>	Medium

Outcome/ Endpoint	Study Population	Exposure	Results	Reference	Data Quality Evaluation
Neuroblastoma	Children (75 cases, 14602 controls), ages <6 born in 1990-2007 in California within 5 km of exposure monitoring stations, cases from California Cancer Registry	Perc (0.186 ppbV) in ambient air, pollution monitoring stations used to estimate maternal exposure during pregnancy from birth certificate address	Non-significant positive association between Perc and neuroblastomas per interquartile increase in exposure at 5km radius	<a href="#">(Heck et al. 2013)</a>	Medium
Astrocytic brain cancer risk	Men in southern Louisiana, United States, exposed from 1978 - 1980; in northern New Jersey and Philadelphia, Pennsylvania, United States, exposed from 1979 - 1981 (n=620, 300 cases, 320 controls)	Tetrachloroethylene, low exposure (1)	Chi trend= -0.65. Exposure not significantly associate with astrocytic brain cancer	<a href="#">(Heineman et al. 1994)</a>	Medium
Cancer mortality	Lockheed Martin aircraft manufacturing factory workers in Burbank, California (employed after January 1, 1960; followed up through December 31, 2008)	Years of exposure to Perc based on job histories and industrial hygiene surveys	No significant trend for any specific cancer or total cancer by increasing years of exposure.	<a href="#">(Lipworth et al. 2011)</a>	High
Lung cancer	Investigation of occupational exposure and environmental causes of respiratory cancers (ICARE) study subjects, population-based case-control study in France 2001-2007 (2274 men cases and 2780 men controls)	Cumulative Exposure Index (CEI) based on self-reported job histories and probability, intensity, and frequency of exposure to Perc based on jobs	Perc was not significantly associated with lung cancer in men.	<a href="#">(Mattei et al. 2014)</a>	Medium

Outcome/ Endpoint	Study Population	Exposure	Results	Reference	Data Quality Evaluation
Mycosis fungoides (MF)	100 patients with Mycosis Fungoides and 2846 controls, 35-69 years of age, from Denmark, Sweden, France, Germany, Italy, and Spain, 1995-1997	Occupational exposure to Perc assessed with job exposure matrix	A positive, non-significant association was observed between Mycosis Fungoides and male subjects with exposure to Perc $\geq$ median of control exposure vs. unexposed male subjects	<a href="#">(Morales-Suárez-Varela et al. 2013)</a>	High
Brain cancer: glioma and meningioma cases	489 glioma cases, 197 meningioma cases, and 799 controls from three USA hospitals in Arizona, Massachusetts and Pennsylvania	Occupational exposure to Perc via self-reported occupational history and industrial hygienist assigned level of exposure	Perc was not significantly associated with glioma or meningioma	<a href="#">(Neta et al. 2012)</a>	High
Cancer of the liver	15 million people participating in a decennial census in Denmark, Finland, Iceland, Norway, and Sweden. Aged 30-64 in years 1960-1990.	Employment in dry cleaning and/or laundering during time period of predominant Perc use	Significantly elevated SIRs were observed in women for stomach, liver, cervical, oral cavity, and lung cancers. No association was found for kidney, bladder, and non-Hodgkin's lymphoma cancer incidence in women.	<a href="#">(Pukkala et al. 2009)</a>	Medium
Diagnosis of kidney cancer	General population case-control study of kidney cancer (1217 cases; 1235 controls). Detroit (2002 - 2007) and Chicago (2003).	Job exposure matrix was used to determine years exposed, average weekly exposure and cumulative hours exposed. to perc	Increased risk of kidney cancer for high intensity exposure group; OR 3.0 (1.3 - 7.4) for 3rd tertile ( $>1820$ hours) vs. unexposed for cumulative hours exposed. No significant associations observed in for other levels of perc exposure.	<a href="#">(Purdue et al. 2017)</a>	High

Outcome/ Endpoint	Study Population	Exposure	Results	Reference	Data Quality Evaluation
Mortality from multiple myeloma	Aircraft maintenance workers (n = 14,457; 10,730 men and 3725 women) at Hill Air Force Base (Utah, USA), for at least one year from 1952-1956, and followed up through 2000	Occupational exposure to Perc (yes/no) based on job-exposure matrix; no quantitative assessment available	Positive association between mortality from multiple myeloma and occupational exposure to Perc compared to no exposure (statistically significant for females, non-statistically significant for males)	<a href="#">(Radican et al. 2008)</a>	Medium
Childhood cancers, neural tube defects, oral clefts,	Children born to mothers with exposure to contaminated drinking water at Camp Lejeune: 51 cases and 526 controls	Perchloroethylene (perc) in drinking water during 1st trimester of pregnancy; modelled exposure high ( $\geq 44$ ppb), low ( $< 44$ ppb)	Positive, non-significant associations observed between childhood cancers and any, high or low 1st trimester exposure to perc compared to unexposed).	<a href="#">(Ruckart et al. 2013)</a>	High
Age of diagnosis of breast cancer (male only).	Case-control, male Marines born before 1969, diagnosed 1995-2013, with identifiable tour dates/locations	Perc, residential drinking water at Camp Lejeune, cumulative exposure $> 159$ ppb	Non-significant positive association between Perc exposure and breast cancer diagnosis and age of diagnosis	<a href="#">(Ruckart et al. 2015)</a>	High
Glioma	Non-farm workers from the Upper Midwest Health Study (798 cases and 1141 controls from Iowa, Michigan, Minnesota, and Wisconsin 1995-1997)	Perc (tetrachloroethylene) use (self-reported occupational history through 1992, bibliographic database of published exposure)	Perc was associated with a significant decrease in gliomas.	<a href="#">(Ruder et al. 2013)</a>	High

Outcome/ Endpoint	Study Population	Exposure	Results	Reference	Data Quality Evaluation
Total lymphoma, HL, B-NHL, T-NHL, B-NHL subentities (DLBCL, FL, CLL, multiple myeloma, marginal zone lymphoma)	710 participating cases (matched to 710 controls) with malignant lymphoma among men and women aged 18 to 80 years in 6 regions in Germany	Cumulative occupational exposure to Perc [ppm*years] based on intensity, the frequency, and duration of Perc exposure (0 to >78.8 ppm*years)	Perc was not significantly associated with malignant lymphoma or any specific type of lymphoma; however, there was an increase (non-significant) in risk of total lymphoma in the highest exposure group (>78.8 ppm*years).	<a href="#">(Seidler et al. 2007)</a>	High
Kidney, bladder, liver, NHL, overall cancer incidence	Swedish national cohort of dry cleaning and laundry workers (n = 10,389) assembled in 1984 followed up for new cases of cancer by matching with the Swedish cancer register from 1985 to 2006	Occupation as dry cleaners and laundry workers exposed to perchloroethylene; exposure levels in the 1970s were of the order of 100–200 mg/m <sup>3</sup> (15–30 ppm)	Non-significant elevated risk of Hodgkin's lymphoma, kidney and liver cancer, significantly elevated risk of Non-Hodgkin's lymphoma and lung cancer; no elevated risk of bladder cancer	<a href="#">(Seldén and Ahlborg 2011)</a>	Medium
Kidney cancer incidence	Greater Montreal metropolitan area. Case-control study of occupationally-exposed men aged 35 to 70 year old (4263 cases, 533 population controls; also hospital and cancer controls).	Any or substantial exposure	ORs were not significantly elevated for PCE exposure and kidney cancer (no quantitative data were provided).	<a href="#">(Siemiatycki 1991)</a>	Medium

Outcome/ Endpoint	Study Population	Exposure	Results	Reference	Data Quality Evaluation
Bladder and other urinary cancer mortality	National Institute for Occupational Safety and Health (NIOSH) Cohort, 34494 workers at NY microelectronics and business machine facility, 2009, 52-65yrs	Cumulative Perc exposure score based on department-exposure matrix	Perc was not significantly associated with bladder and other urinary cancers mortality.	<a href="#">(Silver et al. 2014)</a>	Medium
Testicular cancer	National Institute for Occupational Safety and Health (NIOSH) Cohort, 34494 workers at NY microelectronics and business machine facility, 2009, 52-65yrs	Cumulative Perc exposure score based on department-exposure matrix	Perc was not significantly associated with testicular cancer incidence.	<a href="#">(Silver et al. 2014)</a>	Medium
Acute myeloid lymphoma	Cases of acute myeloid leukemia (n=14,337) diagnosed between 1961 and 2005, and controls (n=71,027) matched by age, sex, and country identified from the Nordic Occupational Cancer Study cohort	Cumulative Perc exposure estimated using job exposure matrix, Median (ppm-yr) 12.1	No significant increase in acute myeloid leukemia risk was observed with low, moderate, or high exposure to Perc, compared to referent group when hazard ratios were calculated using a 10-year lag (p-value = 0.39). Findings for analysis stratified by sex or age were not reported	<a href="#">(Talibov et al. 2014)</a>	High



Outcome/ Endpoint	Study Population	Exposure	Results	Reference	Data Quality Evaluation
Cancer diagnosis: liver/biliary, kidney, bladder, pancreas, lung, cervix, Hodgkin's lymphoma, and non-Hodgkin's lymphoma	Adults working in the Sweden during the 1960 and 1970 census, including 31,418 women and 15,515 men working as launderers, dry cleaners, or pressers	Occupation as a dry cleaner, launderer, or presser served as surrogate for Perc exposure	Increased incidence of Hodgkin's disease (significant), lung (significant), cervix (significant), liver/biliary passages, kidney, and bladder cancer, all other outcomes were non-significant	<a href="#">(Travier et al. 2002)</a>	High
Lung cancer	Lung cancer cases and randomly selected population-based controls frequency matched by sex and age in Montreal Canada	Perc exposure (any or substantial) was assessed by a team of industrial chemists and hygienists based on self-reported job histories	Increase in OR for any exposure or substantial exposure to Perc, results were only significant for any exposure in Study I and in the pooled analysis	<a href="#">(Vizcaya et al. 2013)</a>	Medium
Liver and kidney cancer, non-Hodgkin's lymphoma (NHL) and multiple myeloma (MM)	All subjects aged 30–64 years who participated in 1960 through 1990 censuses in Finland, Iceland, Norway and Sweden; five matched controls per case	Job-exposure matrix, intensity × prevalence of perchloroethylene exposure (90th percentile: 0.05 units)	A positive, non-significant association was observed between high cumulative perchloroethylene exposure (intensity × prevalence) and kidney cancer in men and women.	<a href="#">(Vlaanderen et al. 2013)</a>	High
Renal pelvis cancer, bladder cancer	Employed Swedish residents (1,014 and 360 renal pelvis cancers and 18,244 and 3,347 bladder cancers among men and women, respectively)	Occupation type (workers in laundry, ironing, dyeing) or industry	Non-significant excess risk of renal pelvis cancer among men working in laundry, ironing, dyeing industry.	<a href="#">(Wilson et al. 2008)</a>	Medium

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### 3.2.3.2.3 Carcinogenicity Animal Studies

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(U.S. EPA 2012c) performed a review of the animal toxicity data pertaining to carcinogenicity of PCE from studies conducted through 2011. No additional animal cancer studies were located in U.S. EPA's current systematic review. A summary of the database reviewed by (U.S. EPA 2012c) for each cancer is provided as follows. Full study details are provided in Appendix F.2.

#### Liver

Hepatocellular adenomas and carcinomas exhibited a dose-related increase in male and female B6C3F1 mice exposed by inhalation to PCE at 100 or 200 ppm for 103 weeks, with significant increases in incidence of hepatocellular carcinoma and combined hepatocellular adenomas or carcinomas observed at both exposure concentrations (NTP 1986a). A dose-related increase in hepatocellular adenomas or carcinomas was also observed in male and female Crj:BDF1 mice in a 2-year inhalation study, with increases achieving statistical significance in both sexes at 250 ppm (JISA 1993). A significant increase in the combined incidence of hemangiosarcomas or hemangiomas, occurring in the liver, spleen, fat, subcutaneous skin, and heart, was observed in male mice at 250 ppm (JISA 1993). In an oral study, the incidence of hepatocellular carcinoma was significantly increased in male and female B6C3F1 mice administered time-weighted average doses of 536 or 1,072 mg/kg-day in males and 386 or 772 mg/kg-day in females for 78 weeks, with a decreased time to first tumor in treated male and female mice, compared to controls (NCI 1977).

#### Kidney

Renal tubular adenomas and adenocarcinomas were observed in male, but not female, F344/N rats exposed to PCE by inhalation at 200 or 400 ppm for 103 weeks (NTP 1986a); although incidence was low, the rarity of renal tubular carcinomas in this strain of rat, in combination with the proliferative lesions (renal tubular cell hyperplasia) observed in male rats and one female rat, suggest that these findings are biologically significant.

#### Blood

A dose-related increase in the incidence and severity of MCL was observed in male and female F344/N rats exposed to PCE by inhalation at concentrations up to 400 ppm for 103 weeks, with decreased time to onset in exposed females (NTP 1986a). The incidence of advanced stage MCL was significantly increased in both sexes at 400 ppm (NTP 1986a). (JISA 1993) also observed a positive dose-related trend in the incidence of MCL in male and female F344/DuCrj rats exposed by inhalation for 2 years, reaching statistical significance in males only at 600 ppm. The time to first occurrence of MCL was reduced in exposed female rats, relative to controls (JISA 1993).

#### Brain

A slight, but biologically significant, increase in brain gliomas was observed in male and female F344/N rats exposed to PCE by inhalation at 400 ppm for 103 weeks (NTP 1986a). The fact that this is a rare tumor type, along with a decreased time to first tumor in exposed rats, support the biological significance of this finding.

#### Testis

F344/N rats exposed to PCE vapors at 200 or 400 ppm for 103 weeks exhibited a significant positive dose-related trend in the incidence of testicular interstitial cell tumors (NTP 1986a).

### 3.2.3.2.4 Mode of Action

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#### Liver

Modes of action considered by (U.S. EPA 2012c) for liver cancer induced by PCE in mice include: (1) genotoxicity; (2) epigenetic changes (altered DNA methylation); (3) cytotoxicity and oxidative stress; and (4) peroxisome proliferator-activated receptor (PPAR) activation/peroxisome proliferation. Based on their review of available data, both (U.S. EPA 2012c) and (IARC 2014) determined that multiple modes of action were likely responsible for liver tumors induced by PCE. A number of newer publications (Luo et al. 2018b; Luo et al. 2018a; Cichocki et al. 2017; Luo et al. 2017; Zhou et al. 2017; Lacey et al. 1999) examining toxicokinetic and toxicodynamic responses in the livers of mice exposed to PCE and the related compound, trichloroethylene, provide additional insight into the modes of action for PCE liver cancers in mice.

Much of the research on liver carcinogenicity associated with PCE exposure has focused on the role of the metabolite TCA. Further information on modes of action for TCA hepatocarcinogenicity can be found in the (U.S. EPA 2011b) Toxicological Review for TCA.

### ***Role of metabolism***

Available information on the metabolism of PCE in the liver suggests that the oxidative metabolism is likely the dominant pathway, with glutathione conjugation occurring to a much lesser degree (U.S. EPA 2012c). Metabolism through the oxidative pathway was ~30-fold higher than through the conjugation pathway in male mice of three strains after single oral doses of 1,000 mg/kg PCE (Luo et al. 2018b). The primary oxidative metabolite of PCE is trichloroacetyl chloride (TCAC) which is subsequently hydrolyzed to TCA. Dechlorination of TCA could yield dichloroacetic acid (DCA); however, most of the DCA excreted after exposure to PCE is believed to be produced in the kidney as an end product of  $\beta$ -lyase metabolism (reviewed by (Guyton et al. 2014)). Initially, oxidative metabolism of PCE was believed to be mediated primarily by CYP2E1. However, (Luo et al. 2018a) observed TCA formation in the livers of CYP2E1 knock-out mice (albeit at lower levels than in wild-type), showing that other CYPs can also metabolize PCE to TCA.

Metabolites of the glutathione conjugation pathway also occur in the liver. In C57BL/6J mice given a single dose of 100, 300, or 1,000 mg/kg PCE, dose-dependent increases in the concentrations of S-(1,2,2-trichlorovinyl) glutathione TCVG and N-acetyl-S-(1,2,2-trichlorovinyl)-L-cysteine (NAcTCVC) in the liver were seen, and the concentrations were higher in the liver than in kidney or serum in these animals (Luo et al. 2017). At 1,000 mg/kg, but not lower doses, S-(1,2,2-trichlorovinyl)-L-cysteine (TCVC) was also detected in the liver (Luo et al. 2017), likely because oxidative metabolism was saturated at this dose.

### ***Genotoxicity in the liver***

Individual studies of PCE genotoxicity are discussed above under Genotoxicity. As discussed in that section, PCE shows little to no genotoxic activity in the absence of metabolic activation. Several metabolites resulting from both the oxidative and conjugation pathways have shown some indication of mutagenic activity in vitro, including TCAC, TCVG, TCVC, TCVC sulfoxide (TCVCS), NAcTCVC, and PCE oxide. Among these, TCVG and NAcTCVC have been detected in the livers of C57BL/6J mice. The primary metabolite in the liver, TCA, has shown little to no genotoxic activity in vitro, but testing of this compound is confounded by the pH changes it induces. In vivo studies examining genotoxicity have shown negative or equivocal effects (i.e. modest increases in DNA damage and DNA binding in mouse) (U.S. EPA 2012c). There is also general positive epidemiological evidence (not kidney-specific) of genotoxicity from chronic PCE exposure in humans (Section 3.2.3.2.1).

7125 ***Epigenetic changes***

7126 Changes in the methylation of DNA have been shown to occur early in the development of most tumors  
7127 ([U.S. EPA 2012c](#)). There are no studies examining mouse liver DNA methylation or other epigenetic  
7128 changes after exposure to PCE. A role for DNA hypomethylation in the hepatocarcinogenicity of PCE  
7129 has been postulated based on observations of hypomethylation, especially in the proto-oncogenes c-myc  
7130 and c-jun, in mouse liver after exposure to the metabolites TCA and DCA ([IARC 2014](#); [U.S. EPA](#)  
7131 [2012c](#)). Notably, c-myc DNA hypomethylation occurred earlier than increases in liver cell proliferation  
7132 ([U.S. EPA 2012c](#)).

7133

7134 ***Cytotoxicity and oxidative stress***

7135 Studies in mice and rats exposed for at least 4 weeks provide clear evidence for the hepatotoxic effects  
7136 of PCE (see Section 3.2.3.1.4), and demonstrate that mice are more sensitive to these effects than are  
7137 rats. In mice, oral exposure to PCE has resulted in increased serum alanine aminotransferase (ALT)  
7138 levels, increased liver weight, hepatocellular hypertrophy, fatty degeneration and necrosis, and  
7139 regenerative cell proliferation/increased DNA synthesis ([U.S. EPA 2012c](#)), while inhalation exposure  
7140 induced peroxisome proliferation, mitochondrial proliferation, increased relative liver weight,  
7141 centrilobular lipid accumulation/fatty degeneration, necrosis, and degeneration ([U.S. EPA 2012c](#)). A  
7142 more recent study of male mice from 45 mouse strains given a single oral dose of PCE (1,000 mg/kg)  
7143 showed a range of hepatic effects at sacrifice within 24 hours postdosing; most strains showed  
7144 significant increases in liver triglycerides, and about one-third of the strains exhibited hepatosteatosis of  
7145 varying severities ([Cichocki et al. 2017](#)). PCE-induced accumulation of triglycerides in the liver appears  
7146 to require the presence of CYP2E1, as knock-out mice did not show this effect after 5 days of oral  
7147 exposure while wild-type mice and those expressing humanized CYP2E1 did.

7148

7149 In the one study that examined the relationship between hepatocyte toxicity and regenerative cell  
7150 proliferation in mice ([U.S. EPA 2012c](#)), toxicity (manifested as increased plasma ALT) was evident  
7151 within 24 hours of exposure at all three dose levels (150, 500, and 1,000 mg/kg-day for 30 days). DNA  
7152 synthesis was increased at all doses after 7 days of exposure (the earliest time point measured), and  
7153 histopathologic evidence of regenerative repair was seen after 30 days of exposure to the two higher  
7154 doses ([U.S. EPA 2012c](#)), demonstrating that hepatocyte injury occurred early and may have preceded  
7155 cell proliferation.

7156

7157 In addition to regenerative cell proliferation, other sequelae of hepatotoxicity, including inflammation  
7158 and oxidative stress, could play a role in liver tumors induced by PCE. In humans, fatty liver resulting  
7159 from a high-fat diet is thought to increase oxidative stress, leading to genetic instability and release of  
7160 inflammatory mediators that contribute to the induction of hepatocellular carcinoma (reviewed by  
7161 ([Takakura et al. 2019](#))). As discussed above, hepatic triglyceride accumulation and fatty degeneration  
7162 are hallmarks of PCE exposure in mice. Limited data pertaining to the role of oxidative stress in PCE-  
7163 induced mouse liver toxicity or carcinogenicity are available, showing that administration of the  
7164 antioxidants vitamin E and taurine mitigated hepatic effects (increases in liver to body weight,  
7165 alterations in glycolytic and gluconeogenic enzyme and ATPase activities, and/or hepatocyte  
7166 degeneration and necrosis) in Swiss mice exposed to 3,000 mg/kg-day PCE for 15 days ([U.S. EPA](#)  
7167 [2012c](#)).

7168

7169 Deferme et al. ([2015](#)) reported no increase in oxygen radical formation (measured by electron spin  
7170 resonance spectroscopy) in HepG2 cells exposed to 2 mM PCE in vitro for up to 72 hours. Consistent  
7171 with this result, ([Deferme et al. 2015](#)) did not observe a significant induction of genes related to

7172 oxidative stress after PCE exposure in this system. However, in B6C3F1 mice exposed via gavage, a  
7173 dose-related upregulation of genes involved in oxidation/reduction was observed after exposure to PCE  
7174 ([Zhou et al. 2017](#)).

#### 7175 ***PPAR activation***

7176 PPAR $\alpha$  is a ligand-activated transcription factor involved in the regulation of hepatic lipid metabolism.  
7177 In response to fasting, PPAR $\alpha$  activation in mammals leads to upregulation of genes involved in fatty  
7178 acid  $\beta$ -oxidation, mitochondrial  $\beta$ -oxidation, gluconeogenesis, and autophagy, all aimed at providing the  
7179 fasted body with adequate glucose (reviewed by ([Preidis et al. 2017](#))). Activation of the PPAR $\alpha$  receptor  
7180 as a mechanism for hepatocarcinogenesis is proposed to operate through perturbations in cell  
7181 proliferation and apoptotic pathways, leading to clonal expansion of initiated cells ([U.S. EPA 2012c](#)).

7182  
7183 In laboratory animals exposed to PCE, several effects indicative of PPAR $\alpha$  activation have been  
7184 observed, including increases in the number and size of liver peroxisomes ([U.S. EPA 2012c](#)), increased  
7185 expression of CYP4A peroxisomal marker enzymes ([Cichocki et al. 2017](#); [Zhou et al. 2017](#); [Philip et al.  
7186 2007](#)), and increased hepatic levels of palmitoyl coenzyme A oxidase (PCO, also known as acyl CoA  
7187 oxidase) ([U.S. EPA 2012c](#)). Studies comparing results in rats and mice have shown greater increases in  
7188 PCO in the livers of mice exposed to PCE than in rat livers after exposure to the same doses ([U.S. EPA  
7189 2012c](#)). In vitro testing indicates that activation of mouse and human PPAR $\alpha$  after exposure to PCE is  
7190 likely mediated primarily by the metabolites, TCA and/or DCA, as PCE itself was essentially inactive  
7191 ([U.S. EPA 2012c](#)).

7192  
7193 ([U.S. EPA 2012c](#)) also reviewed the dose-response and temporal concordance between PPAR $\alpha$   
7194 activation and cell proliferation in SW mice exposed to PCE. The original study showed that cell  
7195 proliferation occurred at lower doses ( $\geq 150$  mg/kg-day after 7 days after exposure) and persisted longer  
7196 (14-30 days after exposure at 500 and 1,000 mg/kg-day) than increased expression of PPAR $\alpha$  marker  
7197 CYP4A (1,000 mg/kg-day and only after 7 days of exposure). The study authors suggested that their  
7198 findings argued against a significant role of PPAR $\alpha$  activation in PCE-induced liver carcinogenicity.  
7199 Citing other studies in mice and rats, ([U.S. EPA 2012c](#)) noted that PCE induces a modest peroxisome  
7200 proliferating response in both species, but only mice develop liver tumors, indicating a lack of  
7201 concordance between peroxisome proliferation and occurrence of liver tumors across species.

7202  
7203 Several notable papers probing the role of PPAR $\alpha$  activation in mouse liver after PCE exposure were  
7204 published after the literature searches were performed for the ([ATSDR 2019](#)), ([IARC 2014](#)), and ([U.S.  
7205 EPA 2012c](#)) reviews. In a study comparing mouse liver and kidney transcriptomic responses to  
7206 equimolar oral doses of trichloroethylene and PCE, ([Zhou et al. 2017](#)) observed dose-related upregulation  
7207 of genes involved in PPAR $\alpha$  signaling, fatty acid metabolism, and oxidation/reduction in the livers of  
7208 male B6C3F1 mice exposed to PCE. Genes related to the ATP binding cassette (ABC) family of  
7209 transporters were also upregulated by PCE; some of these transporters are involved in transportation of  
7210 cholesterol and lipids, and some are expressed exclusively in peroxisomes. Genes in mitochondria-  
7211 related pathways and nucleotide metabolism pathways were downregulated. The dose-related alterations  
7212 in gene expression were correlated both with external PCE dose and hepatic levels of TCA. While gene  
7213 expression changes related to PPAR $\alpha$  signaling were common to both trichloroethylene and PCE, effects  
7214 on genes related to ABC transporters, mitochondrial pathways, and nucleotide metabolism were unique  
7215 to PCE ([Zhou et al. 2017](#)).

7218 Cichocki et al. (2017) published a seminal paper examining mouse strain variability in toxicokinetic and  
7219 toxicodynamic responses to PCE exposure. Male mice of 45 strains (Collaborative Cross) received a  
7220 single oral dose of 1,000 mg/kg PCE and were sacrificed at several time points up to 24 hours after  
7221 dosing. In this study, variability in liver TCA levels after exposure spanned almost an order of  
7222 magnitude. In addition, the toxicodynamic response to PCE varied: some strains exhibited significantly  
7223 lower body weight (as much as 15%); only a few showed significant differences in liver to body weight  
7224 ratio. Most strains showed significant increases in liver triglycerides with concomitant decreases in  
7225 serum triglycerides, and about one-third exhibited hepatic steatosis. Similarly, most strains showed  
7226 increased hepatic expression of PPAR $\alpha$  markers CYP4A10 and Acox1 (the gene that encodes acyl CoA  
7227 oxidase or PCO); however, the degree of upregulation varied almost 600-fold across the strains.  
7228 (Cichocki et al. 2017) noted that none of the significant effects of PCE on hepatic endpoints (including  
7229 CYP2E1 protein and triglyceride levels, expression of PPAR $\alpha$  responsive genes, and histopathology  
7230 changes) was correlated with hepatic TCA levels across the tested strains. The reason why dose-related  
7231 gene expression changes were correlated with hepatic TCA levels in male B6C3F1 mice (Zhou et al.  
7232 2017) but not correlated across the strains tested by (Cichocki et al. 2017) is unclear, but could include  
7233 strain differences in CYP isozyme activities and saturation as well as toxicodynamic differences across  
7234 the strains.

7235  
7236 Two studies of PPAR knock-out mice and mice expressing humanized PPAR $\alpha$  exposed to the closely  
7237 related compound trichloroethylene provide insight into the role of PPAR $\alpha$  activation in PCE-induced  
7238 liver effects in mice. PCE and trichloroethylene share the common metabolite TCA, which is believed to  
7239 play a role in the hepatic toxicity and carcinogenicity of both compounds. (Ramdhan et al. 2010)  
7240 compared the effects of trichloroethylene exposure via inhalation at 1,000 or 2,000 ppm (8 hours/day)  
7241 for 7 days in male Sv/129 wild type mice, PPAR $\alpha$ (-/-) knock-out mice, and mice modified to express  
7242 human PPAR $\alpha$  cDNA (hPPAR $\alpha$ ). Hepatic effects of trichloroethylene exposure that did not differ  
7243 significantly among the three strains included increased liver weight, increased plasma aspartate  
7244 aminotransferase (AST) and ALT, and histopathology evidence of liver necrosis. Hepatic inflammation  
7245 was observed at the highest exposure in all strains (and not in controls) but was of lesser severity in both  
7246 PPAR $\alpha$ -null and hPPAR $\alpha$  mice. Only wild type mice exhibited a significant increase in hepatocyte  
7247 proliferation, and only at the highest exposure. In contrast, only PPAR $\alpha$ -null and hPPAR $\alpha$  mice  
7248 exhibited significant increases in liver triglycerides (at both exposure levels in hPPAR $\alpha$  mice, and at the  
7249 highest exposure only in PPAR $\alpha$ -null) and hepatic steatosis (at both exposure levels in both strains). No  
7250 change in hepatic triglycerides or steatosis was seen in wild-type mice. Both wild-type and hPPAR $\alpha$   
7251 mice exhibited upregulation of PPAR $\alpha$  target genes, while PPAR $\alpha$ -null mice did not. Interestingly,  
7252 urinary excretion of TCA was significantly lower (by about half) in PPAR $\alpha$ -null mice compared with  
7253 wild type and hPPAR $\alpha$  mice, indicating that toxicokinetics may explain some of the differences in  
7254 effects.

7255  
7256 To investigate the role of toxicokinetics, (Yoo et al. 2015) administered trichloroethylene by gavage  
7257 (400 mg/kg) to male and female mice (129S1/SvImJ, PPAR $\alpha$ -null, and hPPAR $\alpha$ ) once or 5 days/week  
7258 for 4 weeks and measured metabolite levels in liver, kidney, and serum, and their relationship to PPAR $\alpha$   
7259 activation. Marked sex-related differences in tissue levels of trichloroethylene, trichloroethanol (TCOH),  
7260 and TCA were observed after single or repeat dosing, with males exhibiting significantly higher  
7261 metabolite levels in liver, kidney, and serum. No differences between the strains were seen in levels of  
7262 TCOH in the liver, kidney, or serum, or in levels of TCA in serum after single or repeat dosing. After  
7263 both single and repeat dosing, TCA levels in the liver were significantly lower in PPAR $\alpha$ -null and  
7264 hPPAR $\alpha$  mice of both sexes compared with wild-type mice; in addition, with repeat dosing, the level of

7265 hepatic TCA in hPPAR $\alpha$  males was significantly lower than in PPAR $\alpha$ -null males. Despite much lower  
7266 levels of TCA, trichloroethylene-treated hPPAR $\alpha$  mice of both sexes showed induction of CYP4A10 (a  
7267 marker of PPAR $\alpha$  activation) expression in the liver, and the mRNA levels were comparable to those  
7268 seen in wild-type mice.

### 7269 **Summary**

7270 In summary, PCE appears to induce liver tumors in mice through multiple, potentially interdependent  
7271 modes of action mediated largely by metabolites, including mutagenicity, epigenetic changes,  
7272 cytotoxicity and oxidative stress, PPAR $\alpha$  activation, and possibly also through other changes in gene  
7273 expression. TCA appears to be an important hepatic metabolite but is probably not the only metabolite  
7274 involved in hepatic effects of PCE. Available data show that the metabolism of PCE in the liver varies  
7275 by sex, strain, and CYP2E1 and PPAR $\alpha$  genotypes, and that several PCE metabolites are genotoxic.  
7276 Based on limited data on PCE and studies of the related compound trichloroethylene, PPAR $\alpha$  activation  
7277 is probably not a necessary event for PCE-induced liver tumors but may influence both the metabolism  
7278 and the nature of the hepatic effects induced. In addition to PPAR $\alpha$  activation, PCE exposure also  
7279 upregulates genes involved in ABC transporters, and downregulates nucleotide metabolism and  
7280 mitochondrial-related genes. The relationship, if any, of these changes to the mode(s) of action for PCE  
7281 liver carcinogenicity is unknown.  
7282

### 7283 **Kidney**

7284 (U.S. EPA 2012c) considered four potential modes of action for PCE-induced kidney cancers in rats: (1)  
7285 genotoxicity; (2)  $\alpha$ 2u-globulin accumulation; (3) PPAR $\alpha$  agonism/peroxisome proliferation; and (4)  
7286 cytotoxicity not related to  $\alpha$ 2u-globulin accumulation. (U.S. EPA 2012c) considered it likely that several  
7287 mechanisms contribute to renal carcinogenesis, but found evidence insufficient to draw further  
7288 conclusions, whereas (IARC 2014) concluded that genotoxicity resulting from PCE metabolites in the  
7289 kidney was the most likely mechanism for kidney cancers based on data available at the time of their  
7290 review.  
7291

### 7292 **Role of metabolism**

7293 (Irving and Elfarra 2013) reviewed the available literature and concluded that the nephrotoxicity and  
7294 nephrocarcinogenicity of PCE are mediated primarily through  $\beta$ -lyase-dependent bioactivation of the  
7295 cysteine S-conjugate metabolite TCVC. The steps involved are as follows: PCE is conjugated to GSH in  
7296 the liver to form TCVG; TCVG is processed into the cysteine conjugate (TCVC) in the kidney, bile duct  
7297 epithelium, intestinal lumen, or bile canalicular membrane of hepatocytes; TCVC enters the circulatory  
7298 system and is translocated to the kidney; and  $\beta$ -lyase acts on TCVC to form dichlorothioketene, a  
7299 reactive electrophilic sulfur species. While TCVC has been found to be mutagenic in the Ames  
7300 Salmonella mutagenicity assay, the addition of an inhibitor of  $\beta$ -lyase to the test system has been found  
7301 to reduce the mutagenicity of TCVC, suggesting that the  $\beta$ -lyase-derived metabolites are primarily  
7302 responsible for the mutagenicity of TCVC.  
7303

7304 TCVC may be N-acetylated in the kidney to form the mercapturic acid, NAcTCVC (Luo et al. 2019).  
7305 Both TCVC and NAcTCVC may be further metabolized to form reactive sulfoxides (Luo et al. 2019).  
7306 TCVCS has been observed to have greater nephrotoxicity than TCVC (Elfarra and Krause 2007);  
7307 however, the mutagenic activity of TCVCS in Salmonella is 30-fold lower than that of TCVC (Irving  
7308 and Elfarra 2013).  
7309  
7310



7311 In a study comparing glutathione-pathway metabolites of PCE in male mice of 45 different strains  
7312 administered PCE as a single gavage dose of 1,000 mg/kg, area under the kidney tissue concentration-  
7313 time curves (AUC) estimates for TCVG, TCVC, and NAcTCVC varied by at least 29-fold across the  
7314 strains (Luo et al. 2019), demonstrating marked variability in the metabolism of PCE. Tissue  
7315 concentrations of metabolites of the GSH pathway (liver TCVG, serum TCVG, liver NAcTCVC, and  
7316 kidney NAcTCVC) were found to be significantly correlated with increased kidney levels of Kim-1  
7317 (kidney injury molecule-1), a protein marker of proximal tubular injury (Luo et al. 2019), supporting a  
7318 link between this metabolic pathway and kidney toxicity.

7319  
7320 PCE is also subject to oxidation, yielding TCA. Zhou et al. (2017) found quantifiable concentrations of  
7321 TCA in the kidneys of mice at single gavage doses of 300 mg/kg and higher. TCA levels in the kidney  
7322 were highly correlated with dose-related gene expression changes, including those related to  
7323 peroxisomal fatty acid  $\beta$  oxidation, in the kidney.

### 7324 ***Genotoxicity in the kidney***

7325 As discussed above under Section 3.2.3.2.1, several metabolites of PCE are genotoxic, while the parent  
7326 compound itself shows little to no genotoxic activity in the absence of metabolic activation. The  
7327 evidence for genotoxicity of the primary renal metabolites of PCE is stronger than that for hepatic  
7328 metabolites, as reflected in the IARC conclusion that genotoxicity was the likely mode of action for the  
7329 renal tumors. Specifically, the renal metabolites TCVG, TCVC, TCVCS, and NAcTCVC have all shown  
7330 mutagenic activity in vitro. The mutagenicity of TCVG appears to depend on further metabolism via  
7331 cysteine conjugation, while NAcTCVC is mutagenic following deacetylation (U.S. EPA 2012c),  
7332 suggesting that conversion to TCVC may be necessary for the mutagenic activity of these two  
7333 compounds. TCVC is mutagenic without metabolic activation in cell systems with  $\beta$ -lyase activity, and  
7334 the mutagenic action is blocked by inhibition of  $\beta$ -lyase (Irving and Elfarra 2013), indicating that  $\beta$ -  
7335 lyase-derived metabolites appear to be primarily responsible for the mutagenicity of TCVC. Species-  
7336 and sex-related differences in the activities of  $\beta$ -lyase and other enzymes in the glutathione pathway may  
7337 explain the sex- and species-specific renal carcinogenicity of PCE. As noted earlier, metabolic  
7338 differences among strains resulted in at least 29-fold differences in AUC estimates for TCVG, TCVC,  
7339 and NAcTCVC in the kidneys of male mice of 45 strains exposed to PCE (Luo et al. 2019). There is also  
7340 general positive epidemiological evidence (not kidney-specific) of genotoxicity from chronic PCE  
7341 exposure in humans (Section 3.2.3.2.1).

### 7342 ***A<sub>2</sub>u-Globulin accumulation***

7343 Accumulation of  $\alpha_2$ u-globulin was considered as a mode of action for PCE-induced kidney cancer. This  
7344 mode of action is unique to the male rats because female rats and other mammalian species do not  
7345 accumulate  $\alpha_2$ u-globulin in the kidney. (U.S. EPA 2012c) hypothesized the following sequence of key  
7346 events: excessive accumulation of  $\alpha_2$ u-globulin-containing hyaline droplets in renal proximal tubules,  
7347 cytotoxicity and single-cell necrosis of tubule epithelium, sustained regenerative tubule cell  
7348 proliferation, development of intraluminal granular casts containing sloughed cellular debris associated  
7349 with tubule dilatation and papillary mineralization, foci of tubule hyperplasia in convoluted proximal  
7350 tubules, and formation of renal tubule tumors.

7351 Evidence of hyaline droplet nephropathy has been observed in male rats exposed to PCE (Bergamaschi  
7352 et al. 1992; Green et al. 1990; Goldsworthy et al. 1988). Male F344 rats administered PCE via gavage at  
7353 1,000 mg/kg-day for 10 days showed increases in  $\alpha_2$ u-globulin, protein droplet accumulation,  
7354 crystalloid accumulation, and cell replication in proximal tubules (Goldsworthy et al. 1988). The

7358 increased cell replication, which was correlated with  $\alpha$ 2u-globulin accumulation and occurred in the  
7359 same segment of the proximal tubule, is suggestive of a link between  $\alpha$ 2u-globulin accumulation and  
7360 kidney tumors ([U.S. EPA 2012c](#)). Accumulation of  $\alpha$ 2u-globulin was also observed in the kidneys of  
7361 male rats exposed by gavage to PCE at 500 mg/kg-day for 4 weeks ([Bergamaschi et al. 1992](#)). ([Green et  
7362 al. 1990](#)) observed increased hyaline droplets in the proximal tubules of male rats exposed by gavage to  
7363 PCE at 1,500 mg/kg-day for 42 days, as well as in male rats exposed by inhalation to PCE at 1,000 ppm  
7364 for 10 days. Formation of granular tubular casts and evidence of tubular cell regeneration were also  
7365 observed in rats dosed with PCE at 1,500 mg/kg-day for 42 days ([Green et al. 1990](#)). However,  
7366 accumulation of  $\alpha$ 2u-globulin was not observed in the kidneys of male rats exposed by inhalation to 400  
7367 ppm for 6 hours/day for 28 days ([Green et al. 1990](#)), although ([U.S. EPA 2012c](#)) notes that recovery  
7368 may have occurred during the 18-hour period between the final exposure and sacrifice. It is also possible  
7369 that a longer exposure at this concentration might be required for accumulation of  $\alpha$ 2u-globulin.

7370  
7371 ([U.S. EPA 2012c](#)) noted that  $\alpha$ 2u-globulin accumulation in response to PCE exposure has only been  
7372 observed at doses higher than those associated with kidney tumors. In addition, non-neoplastic kidney  
7373 lesions are not exclusively observed in male rats, as they have also been observed in female rats and  
7374 male and female mice, in which  $\alpha$ 2u-globulin accumulation does not occur. In addition, nephrotoxicity  
7375 has been observed in male and female rats and mice without hyaline droplet formation. ([U.S. EPA  
7376 2012c](#)) concluded that there are insufficient data to demonstrate that PCE-induced renal cancers are  
7377 caused by  $\alpha$ 2u-globulin accumulation.

#### 7378 7379 ***PPAR $\alpha$ agonism/peroxisome proliferation***

7380 Another possible mode of action for kidney cancer examined by ([U.S. EPA 2012c](#)) is PPAR $\alpha$   
7381 agonism/peroxisome proliferation. The following steps are hypothesized: activation of the PPAR $\alpha$   
7382 receptor by one or more reactive metabolites of PCE (e.g., TCA), resulting in alterations in cell  
7383 proliferation and apoptosis, followed by clonal expansion of initiated cells ([U.S. EPA 2012c](#)).

7384  
7385 In an in vitro study, PPAR $\alpha$  derived from humans and mice was found to be activated by PCE  
7386 metabolites dichloroacetate and trichloroacetate, although not by PCE itself ([Maloney and Waxman  
7387 1999](#)).

7388  
7389 In vivo, the activity of PCO, a marker for peroxisomal  $\beta$ -oxidation, was found to be increased (1.2 to  
7390 1.6-fold) in pooled kidneys of mice exposed to PCE by inhalation (6 hours/day) at 200 ppm for 28 days  
7391 or 400 ppm for 14-28 days, significantly increased (1.3-fold) in male rat kidneys at 200 ppm at 28 days  
7392 but not at 400 ppm, and significantly increased (1.2 to 1.6-fold) in female rat kidneys at 200 ppm at 28  
7393 days or 400 ppm at 14-28 days; however, there was no effect on renal catalase activity in rats or mice  
7394 and no peroxisome proliferation was observed in rat or mouse kidney at microscopic examination  
7395 ([Odum et al. 1988](#)). PCO activity was also increased in the kidneys of male rats (1.7-fold, not  
7396 significant) and male mice (2.3-fold, significant) administered PCE by gavage at 1,000 mg/kg-day for  
7397 10 days ([Goldsworthy and Popp 1987](#)). In addition, mice treated with a single dose of 1,000 mg/kg PCE  
7398 showed increased mRNA expression of PPAR $\alpha$ -responsive genes in kidney tissue ([Luo et al. 2019](#)).  
7399 Similarly, by measuring gene expression in the kidney, ([Zhou et al. 2017](#)) observed dose-dependent  
7400 induction of genes associated with peroxisomal fatty acid  $\beta$ -oxidation pathways in a manner in mice  
7401 administered a single dose of PCE.

7402  
7403 Overall, only modest effects on PPAR $\alpha$ -activation, as indicated by peroxisomal enzyme activity, have  
7404 been observed after PCE exposure at doses exceeding those associated with kidney tumors ([Odum et al.](#)

7405 [1988](#); [Goldsworthy and Popp 1987](#)). ([U.S. EPA 2012c](#)) concluded that there is no evidence for PCE (or  
7406 other compounds) that causally links PPAR $\alpha$ -activation to kidney tumorigenesis.

7407  
7408 ***Cytotoxicity not related to  $\alpha$ 2u-globulin accumulation***

7409 ([U.S. EPA 2012c](#)) also examined renal cytotoxicity as a possible mode of action for kidney cancer. It  
7410 was suggested that sustained cytotoxicity and necrosis cause activation of repair processes and cellular  
7411 regeneration that may lead to renal neoplasms. Reactive metabolites of PCE, including TCVC and  
7412 TCVG, produced upon glutathione conjugation are known to result in kidney toxicity ([U.S. EPA 2012c](#)).  
7413 TCVC has been observed to cause dose-related cytotoxicity, measured by release of lactate  
7414 dehydrogenase, in a porcine renal cell line ([Vamvakas et al. 1989a](#)) and in renal proximal tubule cells  
7415 isolated from male rats ([Vamvakas et al. 1989b](#)). 1,2,2-trichlorovinylthiol, an unstable thiol produced by  
7416 cleaving TCVC, may give rise to a highly reactive thioketene, which can form covalent adducts with  
7417 cellular nucleophiles ([U.S. EPA 2012c](#); [Vamvakas et al. 1989b](#)). In another in vitro study, ([Lash et al.](#)  
7418 [2002](#)) observed that PCE and its TCVG metabolite caused increased acute renal cytotoxicity in isolated  
7419 renal cortical cells from rats with the effect being greater in cells isolated from males, as compared to  
7420 females. In addition, TCVC was found to cause acute cytotoxicity in primary cultures of proximal  
7421 tubular cells from rat and human kidneys ([IARC 2014](#)).

7422  
7423 Observed signs of non-neoplastic kidney toxicity in rodents exposed to PCE in vivo have included:  
7424 karyomegaly of the proximal tubules in male and female rats and mice ([Jonker et al. 1996](#); [JISA 1993](#);  
7425 [NTP 1986a](#)), tubular cell hyperplasia in male and female rats ([NTP 1986a](#)), nephrosis (non-  
7426 inflammatory degenerative kidney disease) in female mice ([NTP 1986a](#)), casts in male and female mice  
7427 ([NTP 1986a](#)), atypical tubular dilation of the proximal tubules in male and female rats and mice ([JISA](#)  
7428 [1993](#)), changes in urinary markers related to kidney function (total protein and N-acetyl- $\beta$ -  
7429 glucosaminidase) in female rats ([Jonker et al. 1996](#)), glomerular nephrosis and degeneration in male and  
7430 female mice ([Ebrahim et al. 1996](#)), exacerbation of chronic renal disease in male rats ([JISA 1993](#)), and  
7431 toxic nephropathy in male and female rats and mice ([NCI 1977](#)). Male rats exposed to TCVC or  
7432 TCVCS, metabolites of PCE, by a single intraperitoneal injection showed visible acute renal tubular  
7433 necrosis, intratubular casts and interstitial congestion and hemorrhage (TCVCS only), increased urinary  
7434 glucose concentration and  $\gamma$ -glutamyl transpeptidase activity, and increased blood urea nitrogen  
7435 (TCVCS only), with TCVCS exhibiting greater nephrotoxicity than TCVC ([Elfarrar and Krause 2007](#)).

7436  
7437 Although nephrotoxicity has been observed in both sexes of rats and mice, renal tubular neoplasia have  
7438 been observed only in male rats ([NTP 1986a](#)). In addition, signs of non-neoplastic kidney damage were  
7439 observed in rats and mice of both sexes in the early stages of the ([NTP 1986a](#)) inhalation study,  
7440 suggesting that animals of both species and sexes surviving to scheduled termination had sustained  
7441 nephrotoxicity for the majority of the study period; however, neoplasms were only observed in male  
7442 rats. This is inconsistent with nephrotoxicity being the primary mode of action for kidney neoplasms.

7443  
7444 In humans, symptoms of renal dysfunction, including proteinuria and hematuria, have been observed in  
7445 patients administered PCE via inhalation as an anesthetic ([IARC 2014](#)). One study found an increased  
7446 incidence (>2.5-fold) of end-stage renal disease in dry cleaning workers exposed to PCE by inhalation.  
7447 Urinary markers of renal damage were found to be altered in dry cleaning workers by Mutti et al.  
7448 ([1992](#)); effects included increased prevalence of abnormal values for brush-border antigens, a higher  
7449 geometric mean concentration of brush-border antigens, and a higher concentration of tissue non-  
7450 specific alkaline phosphatase in urine. In addition, dry cleaning workers were observed to have  
7451 significantly increased urinary concentrations of  $\beta$ -glucuronidase and lysozyme, indicators of kidney

7452 function ([IARC 2014](#)). Effects on urinary indicators of renal tubule function, including significantly  
7453 increased prevalence of abnormal values of retinol-binding protein ([Mutti et al. 1992](#)) and a higher  
7454 geometric mean concentration of retinol-binding protein ([IARC 2014](#)) were observed in two of six  
7455 studies of dry cleaning workers.

### 7456 **Summary**

7457 In summary, available data provide evidence for mutagenicity as a likely mode of action for renal  
7458 carcinogenicity induced by PCE, while data supporting other candidate modes of action are more limited  
7459 and have unclear causal links to tumorigenesis.  
7460

### 7461 **Blood**

7462 There is no specific information pertaining to potential modes of action for PCE-induced hematopoietic  
7463 or immune system cancers. Limited data from studies investigating immunotoxicity suggest that PCE  
7464 exposure can alter white cell counts and immune system markers in humans and in mice ([U.S. EPA  
2012c](#)). A more recent in vitro study showed that PCE exposure increased the mRNA expression of  
7465 cytokines IL-6 and IL-10 in murine macrophages, albeit at cytotoxic concentrations ([Kido et al. 2013](#)).  
7466 IL-6 is a pro-inflammatory cytokine but is involved in other reactions as well; IL-10 is an anti-  
7467 inflammatory cytokine that may have been elevated as a response to the increase in IL-6. The role, if  
7468 any, of these immune system perturbations in carcinogenicity induced by PCE is unknown. ([U.S. EPA  
2012c](#)) noted that evidence for effects of PCE on hemolysis and bone marrow function in mice provides  
7470 some support for a leukemogenic effect in rodents but concluded that data were inadequate to establish a  
7471 mechanism for mononuclear cell leukemia in rats exposed to PCE.  
7472

### 7473 **Overall Conclusions**

7474 Overall, the reasonably available evidence for all three tumor sites likely supports a complex MOA, with  
7475 multiple contributing mechanisms of varying significance. There is evidence of kidney and liver-specific  
7476 genotoxicity from PCE metabolites and evidence of PCE genotoxicity in humans from epidemiological  
7477 studies. Induction of other non-genotoxic mechanisms including cytotoxicity and PPAR $\alpha$  activation are  
7478 supported by various evidence, however there is insufficient causal link between these pathways and  
7479 tumorigenesis. Induction of these pathways is often at doses higher than which have been shown to  
7480 promote tumorigenesis, and the effects are not consistent across sex, dose, and time relative to the  
7481 results of cancer bioassays. While  $\alpha$ -2u-globulin-based kidney toxicity in male rats is not relevant to  
7482 humans and the PPAR $\alpha$  pathway is of reduced significant in humans, the reasonably available data does  
7483 not support a clear indication that these are major contributors to the tumorigenesis observed in animal  
7484 cancer bioassays. Therefore, animal carcinogenicity data is considered relevant to humans.

7485 According to EPA's 2005 Guidelines for Carcinogen Risk Assessment ([U.S. EPA 2005a](#)), "a linear  
7486 extrapolation approach is used when the mode of action information is supportive of linearity or mode of  
7487 action is not understood". The evidence for at least a significant contribution of a genotoxic MOA  
7488 supports use of the low-dose linear assumption, while other mechanisms are not well-enough supported  
7489 to suggest a potential threshold approach. Therefore, EPA used the low-dose linear default non-  
7490 threshold assumption for derivation of cancer slope factors (Section 3.2.5.3.3).

## 7491 **3.2.4 Weight of Scientific Evidence**

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### 7492 **3.2.4.1.1 Acute Toxicity**

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7493 Acute exposures to PCE result in neurotoxicity effects that include central nervous system depression  
7494 and visual processing, including loss of consciousness which can result in death. These acute

7495 neurological effects are supported by both human and animal studies as described below in Section  
7496 3.2.4.1.2. There is only limited available information concerning acute irritation and hepatic effects and  
7497 the available evidence is insufficiently quantitative for use in dose-response analysis. Therefore, acute  
7498 toxicity other than neurological effects were not carried forward to dose-response analysis.

#### 7499 **3.2.4.1.2 Neurotoxicity**

---

7500 The hazard database includes reported human evidence of visual deficits ([Getz et al. 2012](#); [Schreiber et](#)  
7501 [al. 2002](#); [Gobba et al. 1998](#); [Cavalleri et al. 1994](#); [Altmann et al. 1990](#)), impaired cognition ([Echeverria](#)  
7502 [et al. 1995](#); [Seeber 1989](#)), increased risky behaviors with associated head injuries following prenatal or  
7503 early childhood PCE exposure ([Aschengrau et al. 2016a](#); [Aschengrau et al. 2011](#)), and decreased math  
7504 test scores ([Stingone et al. 2016](#)). Ambiguous or conflicting evidence was found for increased risk of  
7505 neurodegenerative diseases ([Bove et al. 2014b](#); [Goldman et al. 2012](#)) and autism spectrum disorders  
7506 ([Talbot et al. 2015](#); [von Ehrenstein et al. 2014](#); [Roberts et al. 2013](#); [Kalkbrenner et al. 2010](#)). Clinical,  
7507 biochemical, and neurophysiological signs of neurotoxicity were observed in adult rodents ([Mattsson et](#)  
7508 [al. 1998](#); [Jonker et al. 1996](#); [Tinston 1994](#); [Kjellstrand et al. 1984](#)) as well as indications of impaired  
7509 neurobehavior and motor function in developing rats ([Nelson et al. 1979](#)). A single 4-week inhalation  
7510 study in rats did not observe any clinical signs of neurotoxicity ([Boverhof et al. 2013](#)), however that  
7511 study was primarily focused on immunological endpoints. Overall, based on numerous identified  
7512 functional outcomes in human studies supported by both clinical and mechanistic findings in animals,  
7513 neurotoxicity following PCE exposure is supported by the weight of evidence. Based on consistent  
7514 supporting evidence and sufficient quantitative information, the endpoint of impaired visual function  
7515 (including delayed neurological signaling, color confusion, and visual memory) was carried forward for  
7516 dose-response analysis to represent the neurotoxicity hazard domain.

#### 7517 **3.2.4.1.3 Kidney Toxicity**

---

7518 Mutti et al., ([1992](#)) and several other epidemiological studies from ([U.S. EPA 2012e](#)) suggest likely  
7519 proximal tubular injury following long-term occupational exposure to PCE. Additionally, multiple  
7520 animal studies on both rats and mice demonstrated renal effects in both sexes, including increased  
7521 kidney weights, tubular histopathology, and other indications of kidney toxicity ([Jonker et al. 1996](#);  
7522 [Tinston 1994](#); [JISA 1993](#); [NTP 1986b](#); [NCI 1977](#)). Since the publication of the IRIS Assessment, a  
7523 single 4-week inhalation study in rats did not observe any effects on kidney weight or histology  
7524 ([Boverhof et al. 2013](#)). Overall, based on effects seen in multiple studies in both animals and humans,  
7525 kidney toxicity following PCE exposure is supported by the weight of evidence. Based on consistent  
7526 supporting evidence and sufficient quantitative information, the endpoints of urinary biomarkers for  
7527 nephrotoxicity and nuclear enlargement of proximal tubules were carried forward for dose-response  
7528 analysis to represent the kidney hazard domain.

#### 7529 **3.2.4.1.4 Liver Toxicity**

---

7530 The human literature database is limited, with some indication that PCE exposure affects human liver  
7531 function as well as evidence of negative associations ([Silver et al. 2014](#); [U.S. EPA 2012c](#)). The animal  
7532 database shows very strong support for liver toxicity following PCE exposure, with reports of necrosis,  
7533 vacuolization, inflammation, increased liver weight, biochemical markers, and other indicators of liver  
7534 toxicity in both rats ([Jonker et al. 1996](#); [JISA 1993](#)) and mice ([Buben and O'Flaherty 1985](#)). A four-  
7535 week inhalation study in rats ([Boverhof et al. 2013](#)) that was published after the IRIS Assessment also  
7536 reported hepatic effects (increased relative liver weights and hepatocellular hypertrophy) at the highest  
7537 dose. Overall, based on strong and consistent evidence in animals, liver toxicity following PCE exposure  
7538 is supported by the weight of evidence. Based on consistent supporting evidence and sufficient  
7539 quantitative information, the endpoints of increased angiectasis, increased degeneration/necrosis, and

7540 increased liver/body-weight ratio were carried forward for dose-response analysis to represent the liver  
7541 hazard domain.

#### 7542 **3.2.4.1.5 Reproductive/Developmental Toxicity**

---

7543 The EPA IRIS Assessment ([U.S. EPA 2012c](#)) reported strong epidemiological evidence of adverse  
7544 pregnancy outcomes in women associated with PCE exposure. Human evidence was too limited to  
7545 conclude anything about sperm quality or infertility ([U.S. EPA 2012c](#); [Eskenazi et al. 1991](#)). Data from  
7546 multiple human studies indicate an increased risk of spontaneous abortion ([U.S. EPA 2012c](#)). Animal  
7547 evidence supports effects on both male and female reproductive systems ([U.S. EPA 2012c](#); [Tinston](#)  
7548 [1994](#); [Beliles et al. 1980](#)) as well as developmental outcomes ([U.S. EPA 2012c](#); [Carney et al. 2006](#)).  
7549 There were not any relevant studies published after the IRIS Assessment. Overall, evidence of both male  
7550 and female reproductive effects in animals as and associations between exposure and female  
7551 reproductive in humans along with indications of developmental effects in both study types, both  
7552 reproductive and developmental toxicity following PCE exposure are supported by the weight of  
7553 evidence. Based on consistent supporting evidence and sufficient quantitative information, the  
7554 reproductive endpoint of reduced sperm quality and the developmental endpoints of decreased  
7555 fetal/placental weight, developmental neurotoxicity, and skeletal effects were carried forward for dose-  
7556 response analysis to represent the reproductive/developmental hazard domain.

#### 7557 **3.2.4.1.6 Immune System and Hematological Effects**

---

##### 7558 **Immune System Effects**

7559 The EPA IRIS Assessment ([U.S. EPA 2012c](#)) summarized a large dataset of human studies, some of  
7560 which examined PCE as part of a class of solvents, as well as a few short-term animal studies. While  
7561 some indications of immune effects were observed, the available data was not robust or consistent  
7562 enough to conclude that immune effects are likely to result from PCE exposure. Studies published after  
7563 the IRIS Assessment provide conflicting evidence of immunotoxicity based on no effects observed on  
7564 immune organs ([Boverhof et al. 2013](#)) and positive indications of allergic reaction ([Seo et al. 2012](#))  
7565 following PCE exposure. Overall, based on the absence of consistently observed effects in animals or  
7566 humans, the data for immune effects is inconclusive is not supported by the weight of evidence.  
7567 Therefore, this hazard domain was not carried forward for dose-response analysis.

##### 7568 **Hematological Effects**

7570 Decreased red blood cells and hemoglobin levels with increased total white blood cell and lymphocyte  
7571 counts were observed in a single occupational epidemiology study as described in the EPA IRIS  
7572 Assessment ([U.S. EPA 2012e](#)). Evidence of anemia was observed in mice but not rat studies ([U.S. EPA](#)  
7573 [2012e](#)) and the more recent 4-week inhalation study published after the IRIS assessment ([Boverhof et al.](#)  
7574 [2013](#)) also did not observe any hematological effects. Overall, while there is some indication of  
7575 hematological evidence in humans and mice, the human data is limited and conflicting results were  
7576 observed in rats and mice. Therefore, hematological effects following PCE exposure is insufficiently  
7577 supported by the weight of evidence and this hazard domain was not carried forward for dose-response  
7578 analysis.

#### 7579 **3.2.4.1.7 Cancer**

---

##### 7580 **Weight of Evidence Conclusion**

7581 In accordance with EPA Guidelines for Carcinogen Risk Assessment ([U.S. EPA 2005a](#)), PCE is  
7582 considered “likely to be carcinogenic in humans” by all routes of exposure based on conclusive evidence  
7583 in animals and suggestive evidence in humans.

7584

7585 There is conclusive evidence of the carcinogenicity of PCE, administered by ingestion or inhalation, in  
7586 rats and mice. The most notable findings were statistically significant increases in the incidence of liver  
7587 tumors (hepatocellular adenomas and/or carcinomas) in male and female B6C3F1 and Crj:BDF1 mice  
7588 exposed by inhalation (JISA 1993; NTP 1986a) and male and female B6C3F1 mice exposed by  
7589 ingestion (NCI 1977). Significant increases were also observed in the incidences of mononuclear cell  
7590 leukemia (MCL) in male and female rats (F344/N and/or F344/DuCrj) exposed to PCE by inhalation  
7591 (JISA 1993; NTP 1986a). Additional findings potentially related to treatment included increases in  
7592 testicular interstitial cell tumors and renal tubular adenomas and adenocarcinomas in male F344/N rats  
7593 exposed by inhalation (NTP 1986a), brain gliomas in male and female F344/N rats exposed by  
7594 inhalation (NTP 1986a), hemangiosarcomas/ hemangiomas in male Crj:BDF1 mice exposed by  
7595 inhalation (JISA 1993), and adenomas of the Harderian gland in male Crj:BDF1 mice exposed by  
7596 inhalation (JISA 1993).

7597  
7598 There is a pattern of evidence associating PCE exposure with several types of cancer, specifically  
7599 bladder cancer, NHL, and MM. Additional data were available showing weaker support for cancers at  
7600 other sites, including esophageal, lung, and blood (lymphoma). Studies provide more limited support for  
7601 associations with bladder and breast cancer, with little or no support for associations with kidney,  
7602 esophagus, or liver cancer or MM, and no useful information for cervical cancer.

7603  
7604 Available data indicate that multiple modes of action are likely to be involved in PCE-induced liver  
7605 cancers in male and female mice and possibly renal cancers in male rats as well (Section 3.2.3.2.4).  
7606 Metabolism is a key event in the modes of action for both liver and kidney carcinogenicity. Importantly,  
7607 there appear to be marked sex- and strain-related differences, and possibly species differences, in the  
7608 degrees of oxidative and glutathione conjugative metabolism of PCE, which could explain the species  
7609 and sex specificity of liver and kidney tumors induced by this compound. Several PCE metabolites  
7610 originating from the glutathione pathway are mutagenic, particularly the electrophilic sulfur species that  
7611 result from  $\beta$ -lyase activation of TCVC in the kidney. There is less evidence for non-mutagenic modes  
7612 of action for kidney carcinogenicity associated with PCE exposure; available data do not support  
7613 significant roles for  $\alpha$ -2u globulin accumulation, cytotoxicity unrelated to  $\alpha$ -2u globulin accumulation or  
7614 PPAR $\alpha$  agonism in renal tumor formation. In contrast, there is evidence suggesting that several modes  
7615 of action, in addition to mutagenicity, may be operant in the liver, including: epigenetic changes leading  
7616 to oncogene activation; cytotoxicity, inflammation, and oxidative stress; activation of PPAR $\alpha$  leading to  
7617 perturbations in cell proliferation or apoptosis; and other changes in gene expression that may influence  
7618 cellular energetics, growth, and/or cell cycle. The importance of any one of these modes of action likely  
7619 depends on dose, species, sex, and strain, given the variability in and importance of PCE metabolism to  
7620 the various modes of action.

### 7621 **3.2.5 Dose-Response Assessment**

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#### 7622 **3.2.5.1 Selection of Studies for Dose-Response Assessment**

---

7623 Dose-response analysis started with the consideration of all acceptable toxicity studies identified in the  
7624 prior sections and selection of the studies that reported both adverse effects and data amenable to dose-  
7625 response assessment. Dose-response assessment was organized into 5 domains: (1) acute toxicity, (2)  
7626 neurotoxicity, (3) kidney toxicity, (4) liver toxicity and (5) reproductive/developmental toxicity.

##### 7627 **3.2.5.1.1 Non-Cancer Toxicity from Acute/Short-Term Exposure**

---

7628 Based on the weight of the scientific evidence evaluation neurotoxicity was selected for dose-response  
7629 analysis for effects from acute/short-term exposure. Quantitative data amenable to dose-response

7630 assessment from human studies (controlled experiments) are available for this endpoint. Studies  
7631 available for evaluating acute exposures include controlled human exposures ([Altmann et al. 1990](#)).  
7632 Data are also available from animal studies to support this health effect domain following acute  
7633 exposure. The human studies are considered adequate and are preferable to animal studies.  
7634

7635 In the study by Altmann et al. ([1990](#)), male volunteers were exposed to PCE at 10 or 50 ppm,  
7636 4 hours/day for 4 days. At 50 ppm, increased latencies in pattern reversal visual-evoked potential  
7637 ( $p<0.05$ ) were observed. No effects on brainstem auditory-evoked potential were noted at either  
7638 concentration. Because faint odor was reported by 33% of the subjects at 10 ppm and 29% of the  
7639 subjects at 50 ppm on the first day of testing, and by 15% of the subjects at 10 ppm and 36% of the  
7640 subjects at 50 ppm on the last day of testing, the investigators concluded that only a few subjects could  
7641 identify their exposure condition. PCE in the blood increased with exposure duration, and based on  
7642 linear regression, PCE was associated with increased pattern reversal visual-evoked potential latencies  
7643 ( $r=-0.45$ ,  $p<0.03$ ) ([Altmann et al. 1990](#)). EPA considered a no-observed-adverse-effect level (NOAEL)  
7644 of 10 ppm for exposures of 4 hours/day. The study scored a medium in data quality.  
7645

7646 Other studies assessed different endpoints in the spectrum of neurotoxicity effects. Hake and Stewart  
7647 ([1977](#)) exposed 4 male subjects sequentially to 0, 20, 100, and 150 ppm (each concentration 1 week)  
7648 PCE 7.5 hours/day for 5 days. Changes in flash-evoked potentials or equilibrium tests were not  
7649 observed. Subjective evaluation of EEG (electroencephalogram) scores suggested cortical depression in  
7650 subjects exposed at 100 ppm. Decreases in the Flanagan coordination test were observed at  $\geq 100$  ppm.  
7651 Rowe et al. ([1952](#)) exposed 6 volunteers to 106 ppm PCE for 1 hr. Eye irritation and a slight fullness in  
7652 the head was noted by one subject, but other neurotoxicity endpoints were not evaluated.  
7653

7654 The National Research Council (NRC) ([2010](#)) review of the PCE IRIS assessment included a  
7655 recommendation of five studies for consideration in deriving the reference concentration (RfC) ([Boyes](#)  
7656 [et al. 2009](#); [Gobba et al. 1998](#); [Echeverria et al. 1995](#); [Cavalleri et al. 1994](#); [Altmann et al. 1990](#)). Of  
7657 these studies recommended for consideration by NRC two are acute studies [the human chamber study  
7658 of Altmann et al. ([1990](#)) and the rodent study of Boyes et al. ([2009](#))]. These were judged by EPA in the  
7659 IRIS assessment to be supportive, but were not considered further for deriving candidate RfCs because  
7660 of the preference to use quality studies of chronic, human exposures over studies of acute exposures. For  
7661 the dose-response assessment of effects from acute exposures the Altmann et al. ([1990](#)) study in humans  
7662 is preferred rather than the Boyes et al. ([2009](#)) study in rodents.  
7663

7664 Based on these considerations, EPA chose the effects observed in Altmann et al. ([1990](#)) for dose-  
7665 response analysis of acute effects. These studies identified increased latencies for pattern reversal visual-  
7666 evoked potentials at 50 ppm and a NOAEL of 10 ppm.

### 7667 **3.2.5.1.2 Non-Cancer Toxicity from Chronic Exposure**

7668 The studies presented below are the principal studies containing adequate quantitative dose-response  
7669 information for various endpoints within each health domain. See Section 3.2.5.4 for selection of the  
7670 most representative studies within each domain.  
7671

#### 7672 **Neurotoxicity**

7673 Based on the review in the EPA IRIS Assessment for PCE ([U.S. EPA 2012c](#)) and NRC (2010), two  
7674 studies, Cavalleri et al. ([1994](#)) and Echeverria et al. ([1995](#)), are considered the principal studies for the  
7675 evaluation of chronic neurotoxicity. Endpoints selected were reaction time measures ([Echeverria et al.](#)



7676 [1995](#)), cognitive changes ([Echeverria et al. 1995](#)), and visual function changes ([Cavalleri et al. 1994](#)).  
7677 EPA's data quality evaluations of these studies were both medium. The 2012 Perchloroethylene IRIS  
7678 Assessment ([U.S. EPA 2012c](#)) additionally calculated the midpoint of the range from these two studies,  
7679 and this value was also brought forward to dose-response analysis.

### 7680 **Kidney**

7681 Two acceptable studies were identified that contained adequate dose-response information: ([Mutti et al.](#)  
7682 [1992](#)) and ([JISA 1993](#)). Mutti et al. ([1992](#)) was an epidemiological study that identified urinary markers  
7683 of neprotoxicity. JISA ([1993](#)) observed nuclear enlargement of proximal tubules in both rats and mice.  
7684 Mutti et al. ([1992](#)) scored a Medium in data quality and JISA ([1993](#)) scored a High.

### 7685 **Liver**

7686 Three studies were considered for dose-response analysis of liver effects. The same JISA ([1993](#)) study  
7687 that examined kidney effects also observed increased liver angiectasis (extreme dilation of blood or  
7688 lymph vessels) in mice. An NTP study ([1986b](#)) that also scored high in data quality identified increased  
7689 liver degeneration and necrosis in mice, while the medium-quality study ([Buben and O'Flaherty 1985](#))  
7690 reported increased liver/body weight ratio in mice following PCE administration.

### 7691 **Reproductive/Developmental**

7692 A single reproductive study reported adequate dose-response information. Beliles et al. ([1980](#)) identified  
7693 reduced sperm quality following 5 days of PCE exposure in mice. The study scored a high in data  
7694 quality.

7695 For developmental effects, three relevant studies were identified. Nelson et al. ([1979](#)) identified  
7696 decreased weight gain and developmental neurotoxicity in the form of altered behavior and changes in  
7697 brain acetylcholine. The study only scored a Low in data quality, however it was still considered for  
7698 dose-response analysis because it is the only identified study with adequate dose-response information  
7699 relating to functional and molecular indicators of developmental neurotoxicity, and the CNS is an  
7700 important target of perchloroethylene. The other two studies both scored a High in data quality and were  
7701 also utilized for dose-response analysis. Tinston et al. ([1994](#)) identified increased neonatal pup death and  
7702 CNS depression in a two-generation study, and ([Carney et al. 2006](#)) observed decreased fetal/placental  
7703 weight and skeletal effects in a short-term developmental toxicity study.

### 7704 **3.2.5.1.3 Cancer**

7705 As discussed in the Weight of Evidence Section 3.2.4.1.7, based on EPA Guidelines for Carcinogen  
7706 Risk Assessment ([U.S. EPA 2005a](#)). PCE is characterized as "likely to be carcinogenic in humans by all  
7707 routes of exposure," based on conclusive evidence in mice and rats and suggestive evidence in humans.  
7708 No available human studies of cancer were found to be suitable for dose-response assessment.  
7709 Therefore, the following dose-response assessment is based on data from rodent bioassays. Multiple  
7710 MOAs for PCE carcinogenicity were considered in the MOA Section 3.2.3.2.4 specific to each tumor  
7711 type. Overall, the tumors reported in rodent bioassays are considered relevant to humans and human  
7712 cancer risks are estimated from the rodent dose-response data.

7713 As discussed in Section 3.2.3.2.3 three chronic exposure studies in rats and mice include an oral gavage  
7714 study in mice and female rats by the National Cancer Institute ([NCI 1977](#)) and two inhalation studies in  
7715 mice and rats ([JISA 1993](#); [NTP 1986b](#)) established that the administration of PCE, either by ingestion or  
7716 by inhalation to sexually mature rats and mice, results in increased incidence of tumors. Mouse liver  
7717 tumors (hepatocellular adenomas and carcinomas) and rat mononuclear cell leukemia (MCL) were

7723 reported in both sexes in two lifetime inhalation bioassays employing different rodent strains ([JISA](#)  
7724 [1993](#); [NTP 1986b](#)), and mouse liver tumors were also reported in both sexes in an oral bioassay ([NCI](#)  
7725 [1977](#)). Tumors reported in a single inhalation bioassay include kidney and testicular interstitial cell  
7726 tumors in male F344 rats ([NTP 1986b](#)), brain gliomas in male and female F344 rats ([NTP 1986b](#)), and  
7727 hemangiomas or hemangiosarcomas in male Crj:BDF1 mice ([JISA 1993](#)). The NCI ([1977](#)) study was  
7728 considered to be inconclusive because of the high incidence of respiratory disease, and high mortality  
7729 with PCE exposure. See ([U.S. EPA 2012e](#)) for more discussion.

7730  
7731 All three bioassays ([JISA 1993](#); [NTP 1986b](#); [NCI 1977](#)) showed increases in hepatocellular tumors in  
7732 male and female mice. Hemangiomas also increased in male mice and MCL increased in both sexes of  
7733 rats. The data is summarized in Table 3-4 below.

7734  
7735 Despite the positive results, the NCI ([1977](#)) study was considered to be inconclusive because of the high  
7736 incidence of respiratory disease, and high mortality with PCE exposure. Therefore considered the JISA  
7737 ([1993](#)) and NTP ([1986b](#)) studies for dose-response analysis. Both studies scored a High for data quality,  
7738 however ([JISA 1993](#)) examined an additional dose level and covers a broader dose range. Therefore, the  
7739 JISA ([1993](#)) study was selected for use in dose-response analysis and POD derivation. It is **bolded** in  
7740 Table 3-4 below.

7741 **Table 3-4. Tumor incidence in mice exposed to PCE**

Bioassay	Doses/Exposures		Sex	Body Weight <sup>a</sup> (kg)	Survival-adjusted tumor incidence <sup>b</sup> (%)	
	Administered	Continuous Equivalent				
Hepatocellular adenomas or carcinomas						
NCI ( <a href="#">1977</a> ) <sup>c</sup> B6C3F <sub>1</sub> mice Gavage: 5 d/wk, 78 wk	Vehicle control	0 <sup>e</sup> mg/kg-day	Male	0.030	2/20	(10)
	450 mg/kg-day	332			32/48	(67)
900	663	27/45			(60)	
NTP ( <a href="#">1986b</a> ) B6C3F <sub>1</sub> mice Inhalation: 6 hr/d, 5 d/wk, 104 wk	Vehicle control	0 <sup>e</sup> mg/kg-day	Female	0.025	0/20	(0)
	300 mg/kg-day <sup>d</sup>	239			19/48	(40)
	600	478			19/45	(42)
JISA ( <a href="#">1993</a> ) Crj:BDF1 mice Inhalation: 6 hr/d, 5 d/wk, 104 wk	0 ppm	0 ppm	Male	0.037	17/49	(35)
	100	18			31/47	(70)
JISA ( <a href="#">1993</a> ) Crj:BDF1 mice Inhalation: 6 hr/d, 5 d/wk, 104 wk	200	36	Female	0.032	41/50	(82)
	0 ppm	0 ppm			4/45	(9)
	100	18			17/42	(40)
	200	36			38/48	(79)
JISA ( <a href="#">1993</a> ) Crj:BDF1 mice Inhalation: 6 hr/d, 5 d/wk, 104 wk	0 ppm	0 ppm	Male	0.048	13/46	(28)
	10	1.8			21/49	(43)
	50	9.0			19/48	(40)
	250	45			40/49	(82)
JISA ( <a href="#">1993</a> ) Crj:BDF1 mice Inhalation: 6 hr/d, 5 d/wk, 104 wk	0 ppm	0 ppm	Female	0.035	3/50	(6)
	10	1.8			3/47	(6)
	50	9.0			7/48	(15)
	250	45			33/49	(67)
Hemangiosarcomas <sup>e</sup> , liver or spleen						

Bioassay	Doses/Exposures		Sex	Body Weight <sup>a</sup> (kg)	Survival-adjusted tumor incidence <sup>b</sup> (%)	
	Administered	Continuous Equivalent				
<b>JISA (1993)</b> <b>Same conditions as above</b>	0 ppm	0 ppm	Male	0.048	4/46	(4)
	10	1.8			2/49	(2)
	50	9.0			7/48	(13)
	250	45			11/49	(18)
Mononuclear cell leukemia (MCL)						
NTP (1986b) F344/N rats Inhalation:	0 ppm	0 ppm	Male	0.44	28/50	(56)
	200	36			37/48	(77)
	400	71			37/50	(74)
6 hr/d, 5 d/wk, 104 wk	0 ppm	0 ppm	Female	0.32	18/50	(36)
	200	36			30/50	(60)
	400	71			29/50	(58)
<b>JISA (1993)</b> <b>F344/CuCrj rats</b> <b>Inhalation:</b> <b>6 hr/d,</b> <b>5 d/wk,</b> <b>104 wk</b>	0 ppm	0 ppm	Male	0.45	11/50	(22)
	50	9			14/50	(28)
	200	36			22/50	(44)
	600	110			27/50	(54)
	0 ppm	0 ppm	Female	0.3	10/50	(20)
	50	9			17/50	(34)
	200	36			16/50	(32)
	600	110			19/50	(38)

Note: Data sets carried through dose-response modeling shown in bold. Data is from Table 5-13 and 5-15 in (U.S. EPA 2012e).

<sup>a</sup>Average body weight reached during adulthood.

<sup>b</sup>Animals dying before the first appearance of the tumor of interest but no later than Week 52 were omitted from the totals because these animals were presumed not to have adequate time on study to develop tumors.

<sup>c</sup>No adenomas were reported in this study.

<sup>d</sup>Gavage doses listed were increased after 11 weeks by 100 mg/kg-day in each low-dose group or by 200 mg/kg-day in each high-dose group. Animals surviving the 78-week exposure period were observed until Week 90 study termination. Lifetime average daily (administered) doses (LADDs) were calculated as follows:

$$\begin{aligned} \text{LADD (mg/kg-day)} &= \text{Cumulative administered dose (mg/kg)} / (\text{total days on study}) \\ &= \{[(\text{initial dose rate} \times 11 \text{ weeks}) + (\text{later dose rate} \times 67 \text{ weeks})] / 90 \text{ weeks}\} \\ &\quad \times 5/7 \text{ (days)} \end{aligned}$$

<sup>e</sup>These tumors were reported as hemangioendotheliomas in the JISA (1993) report. The term has been updated to hemangiosarcoma. Note that these incidences do not match those tabulated in Tables 11 and 12 of the JISA report summary. The incidences reported here represent a tabulation of hemangioendotheliomas in liver or spleen from the individual animal data provided in the JISA report.

### 3.2.5.2 Potentially Exposed and Susceptible Subpopulations

TSCA requires the risk evaluation “determine whether a chemical substance presents an unreasonable risk of injury to health or the environment, without consideration of cost of other non-risk factors, including an unreasonable risk to a potentially exposures of susceptible subpopulation identified as relevant to the risk evaluation by the Administrator, under the conditions of use.” TSCA § 3(12) states that “the term ‘potentially exposed or susceptible subpopulation’ means a group of individuals within the general population identified by the Administrator who, due to either greater susceptibility or greater exposure, may be at greater risk than the general population of adverse health effects from exposure to a chemical substance or mixture, such as infants, children, pregnant women, workers, or the elderly.”

7771 During problem formulation ([U.S. EPA 2018d](#)), EPA identified potentially exposed or susceptible  
7772 subpopulations during the development and refinement of the life cycle, conceptual models, exposure  
7773 scenarios, and analysis plan. In this section, EPA addresses the potentially exposed or susceptible  
7774 subpopulations identified as relevant based on *greater susceptibility*. EPA addresses the subpopulations  
7775 identified as relevant based on *greater exposure* in Section 2.4.3.  
7776

7777 Factors affecting susceptibility examined in the available studies on PCE include lifestage, biological  
7778 sex, genetic polymorphisms, race/ethnicity, preexisting health status, lifestyle factors, and nutrition  
7779 status. PCE is lipophilic and accumulates in fatty fluids and tissues in the human body (Section 0).  
7780 Additionally, the PCE half-life is substantially higher in adipose tissue compared to others (55-65 hours  
7781 in adipose, <12-40 hours in others, see Section 3.2.2.1.3). Subpopulations that may have higher body fat  
7782 composition, and therefore may be more highly exposed to sustained internal PCE concentrations/doses,  
7783 include pubescent and adult women (including women of child-bearing age) as well as any individual  
7784 with an elevated body-mass-index. Based on evidence of developmental toxicity from PCE exposure,  
7785 pregnant women, the developing fetus and newborn infants are all considered highly susceptible  
7786 subpopulations, and therefore women of childbearing age are susceptible by proxy. Effects on male  
7787 fertility are more likely to present in older men, while kidney and liver effects are of most concern to  
7788 subpopulations with pre-existing liver or kidney dysfunction. The partitioning of PCE to fatty tissue is of  
7789 particular concern for those with fatty liver disease. Neurological endpoints are primarily related to  
7790 visual function, pattern recognition, and memory. Therefore, subpopulations with poor vision or  
7791 neurocognitive deficiencies may be especially susceptible to these hazards.  
7792

7793 Variability in CYP metabolic capacity is generally believed to vary by approximately 10-fold among all  
7794 humans, however individual variations in *in vitro* CYP2E1 activity as high as 20-50 fold have also been  
7795 reported. Diagnoses of polymorphisms in carcinogen-activating and -inactivating enzymes and cancer  
7796 susceptibility have been noted, and GST polymorphisms have been associated with increased risk of  
7797 kidney cancer in the related chemical trichloroethylene. Co-exposure to other pollutants and drugs may  
7798 also have either an activating or inhibitory effect on PCE-metabolizing enzymes ([U.S. EPA 2012c](#)).

### 7799 **3.2.5.3 Derivation of Points of Departure (PODs)**

---

#### 7800 **3.2.5.3.1 Non-Cancer PODs for Acute/Short-term Inhalation Exposure**

---

7801 Workers and consumers can be exposed to a single acute exposure to PCE under various conditions of  
7802 use via inhalation and dermal routes. EPA identified PODs for several acute inhalation exposure  
7803 durations based on both hazard and exposure considerations. The duration of 4 hrs/day is based on the  
7804 study conditions of Altmann et al. ([1990](#)). Longer durations of 8 hrs/day and 12 hrs/day are  
7805 representative of typical work shifts and are used for occupational settings. For consumers, EPA also  
7806 evaluated a 24-hr exposure to account for exposure scenarios when a user remains in the house after  
7807 using a PCE-containing product, i.e., a consumer product used for a specific length of time, with  
7808 subsequent exposure to dissipating concentrations of PCE in the indoor environment over the course of a  
7809 day. Conversion of the acute PODs for different exposure durations are shown in Table 3-5.

7810 Altmann et al. ([1990](#)) is a relatively well-conducted study of 10 volunteers each that identified increased  
7811 latencies for pattern reversal visual-evoked potentials after 4 hrs/day for 4 days exposure to 50 ppm and  
7812 no effects at 10 ppm. EPA's data quality evaluation rated this study medium quality. EPA used the  
7813 NOAEC of 10 ppm. The ATSDR Toxicity Profile included this NOAEC among endpoints for derivation  
7814 of the acute MRL (minimum risk level) ([ATSDR 2019](#)). The acute MRL is derived for exposures up to  
7815 14 days and additional information was considered for exposures longer than the 4 days of the Altmann

et al. (1990). This is consistent with how EPA is considering Altmann et al. (1990) for acute exposures to workers and consumers.

**Table 3-5. Conversion of Acute PODs for Different Exposure Durations**

Exposure Duration	POD	Effect	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality
4 hrs/day duration of the study	10 ppm (68 mg/m <sup>3</sup> )	Neurotoxicity increased latencies for pattern reversal visual-evoked potentials	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =1  Total UF=10	Altmann et al. (1990)	Medium
8 hrs/day	5 ppm (34 mg/m <sup>3</sup> )				
12 hrs/day	3.3 ppm (22 mg/m <sup>3</sup> )				
24 hrs/day	1.7 ppm (11 mg/m <sup>3</sup> )				

EPA applied a composite UF of 10 for the acute inhalation benchmark MOE, based on the following considerations:

- 1) **Interspecies uncertainty/variability factor (UF<sub>A</sub>) of 1** - Accounting for differences between animals and humans is not needed because the POD is based on data from humans
- 2) **A default intraspecies uncertainty/variability factor (UF<sub>H</sub>) of 10** - To account for variation in sensitivity within human populations due to limited information regarding the degree to which human variability may impact the disposition of or response to PCE. Some of the specific variabilities/uncertainties for PCE are accounted for with this UF<sub>H</sub> include toxicokinetic differences.
- 3) **A LOAEC-to-NOAEC uncertainty factor (UF<sub>L</sub>) of 1** - The POD is based on a NOAEC so this factor is not needed.

### 3.2.5.3.2 Non-Cancer PODs for Chronic Inhalation Exposure

All chronic PODs were derived as 24hr Human Equivalent Concentration (HEC) values, with results from animal studies adjusted for continuous exposure based on the output from the PBPK model as presented in (U.S. EPA 2012e). All PODs are presented in Table 3-8.

#### Neurotoxicity

EPA identified LOAELs for color confusion from (Cavalleri et al. 1994) and impaired pattern recognition and reaction time in pattern memory from (Echeverria et al. 1995) as relevant endpoints for POD derivation. For the studies and endpoints selected, it was determined that PODs could not be derived using dose-response modeling (described in more detail in (U.S. EPA 2012e)). Therefore, the midpoint of the range of the two LOAELs from each study was also derived as a representative POD. This is consistent with the use of the midpoint for the reference concentration/dose in (U.S. EPA 2012e). For occupational human studies such as these, the HEC derivation also involved adjusting the breathing rate from 10 m<sup>3</sup>/day over 8 hrs to 20m<sup>3</sup>/day over 24 hrs, and multiplying the PODs by 5/7 to adjust from weekday working hours to continuous exposure (U.S. EPA 2012e).

7851  
7852 EPA applied a composite UF of 100 for the inhalation benchmark MOE for neurotoxicity, based on the  
7853 following considerations:

7854  
7855 **1) Interspecies uncertainty/variability factor (UF<sub>A</sub>) of 1**

7856 Accounting for differences between animals and humans is not needed because the POD is based  
7857 on data from humans

7858  
7859 **2) An intraspecies uncertainty/variability factor (UF<sub>H</sub>) of 10**

7860 To account for variation in sensitivity within human populations due to limited information  
7861 regarding the degree to which human variability may impact the disposition of or response to,  
7862 PCE.

7863  
7864 **3) A LOAEC-to-NOAEC uncertainty factor (UF<sub>L</sub>) of 10**

7865 The POD is based on a LOAEC so this factor is needed.

7866  
7867 **4) Subchronic to chronic factor (UF<sub>S</sub>) of 1**

7868 The data for these endpoints come from chronic studies covering greater than 10% of human  
7869 lifetime, so an additional adjustment for shorter-duration studies is not required.

7870  
7871  
7872 Alternative HEC for Occupational Scenarios

7873 In addition to the HEC derived from the 2012 IRIS Assessment ([U.S. EPA 2012e](#)), EPA derived 8 hr  
7874 HEC values for the above endpoints based on occupational exposure.

7875  
7876 The 24 hr HEC as originally derived was applicable to the general population, who would be  
7877 continuously exposed to PCE at a resting breathing rate. The data for these endpoints are from  
7878 epidemiological studies of dry cleaning and laundry workers exposed to PCE. In order to account for  
7879 increased breathing rate of workers (i.e. 10 m<sup>3</sup> over 8 hr as opposed to 20 m<sup>3</sup> over 24 hr, according to  
7880 [U.S. EPA 2012e](#)), EPA additionally derived 8 hr occupational HECs using the 8 hr LOAEC values  
7881 from the original studies. 12 hr HECs were also derived based on adjustment from the 8 hr values for  
7882 use with 12 hr Occupational Exposure Scenarios (OES). These additional derivations did not result in  
7883 any change to the uncertainty factors.

7884  
7885 **Kidney**

7886 EPA identified a LOAEL from ([Mutti et al. 1992](#)) for urinary biomarkers along with NOAELs from  
7887 ([JISA 1993](#)) for proximal tubule nuclear enlargement in both mice and rats. Cumulative UFs for the two  
7888 NOAELs is 30, with a UF<sub>H</sub> = 10 for human uncertainty/variability and UF<sub>A</sub> = 3 for interspecies  
7889 toxicodynamic uncertainty/variability, because only toxicokinetic differences are captured by the PBPK  
7890 model. The LOAEL from ([Mutti et al. 1992](#)) is a human study and therefore has a UF<sub>A</sub> of 1, however it  
7891 has an additional UF<sub>L</sub> of 10 for being based on a LOAEL and therefore the cumulative UF is 100. All  
7892 studies are of chronic duration, so UF<sub>S</sub> = 1.

7893  
7894 **Liver**

7895 EPA identified three distinct liver endpoints in mice as suitable for dose-response analysis. The NOAEL  
7896 from ([JISA 1993](#)) for increased angiectasis (abnormal dilation of blood vessels) has a cumulative UF of  
7897 30 based on UF<sub>A</sub> and UF<sub>H</sub> as described above. A LOAEL was obtained for increased liver

7898 degeneration/necrosis from (NTP 1986b), resulting in a cumulative UF of 300 due to the added UF<sub>L</sub> of  
7899 10. These two studies are of chronic duration, so UF<sub>S</sub> = 1. A LOAEL for increased liver/body-weight  
7900 ratio from subchronic data in (Buben and O'Flaherty 1985) has a cumulative UF of 3000 due to the  
7901 added UF<sub>L</sub> of 10 and UF<sub>S</sub> = 10.

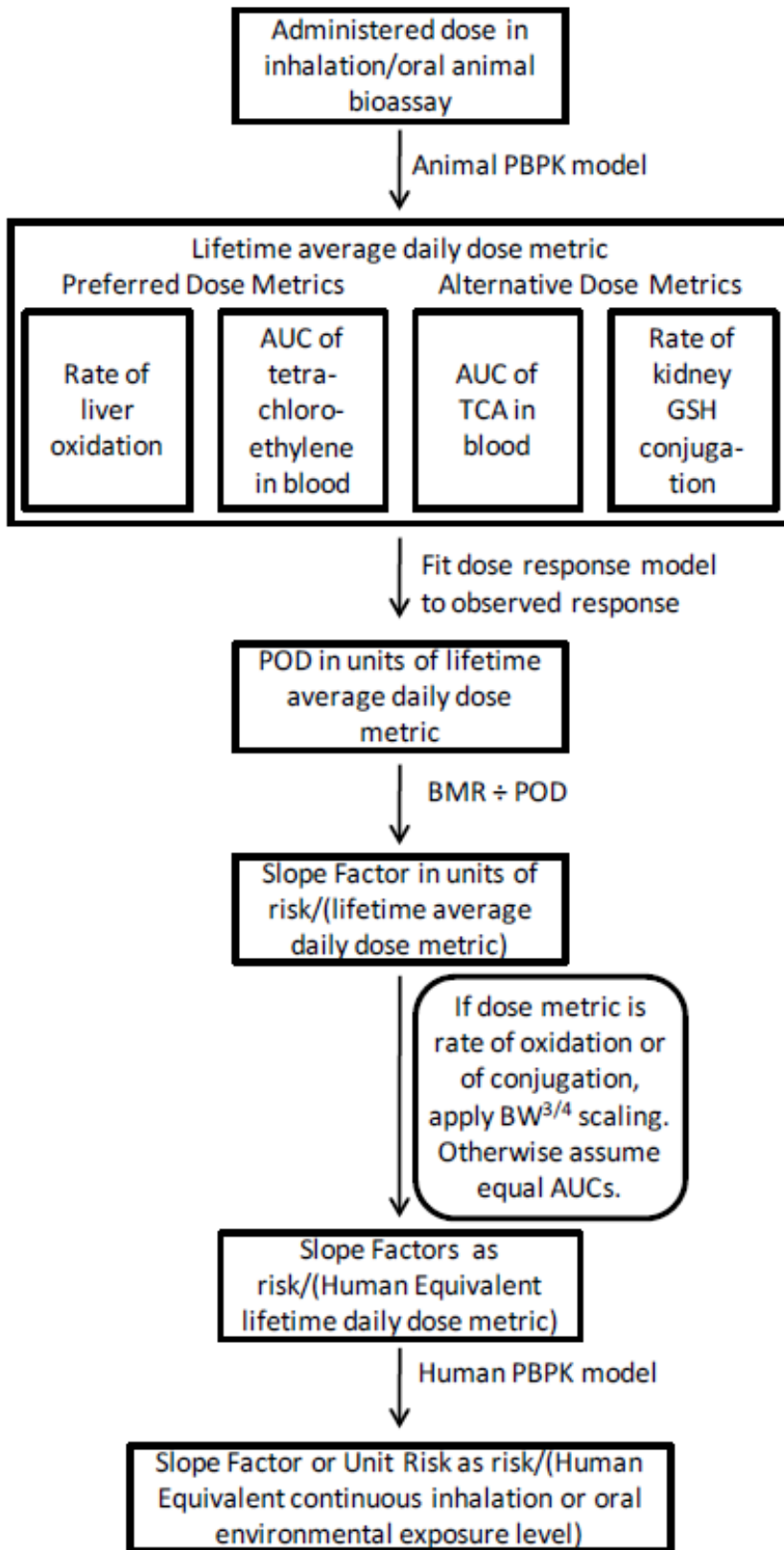
### 7902 **Reproductive/Developmental**

7903 A reproductive NOAEL for reduced sperm quality in mice was obtained from (Beliles et al. 1980).  
7904 Despite being of only 5 days exposure, this duration this exposure duration covers the window of sperm  
7905 production while the observation period up to 10 weeks covered the full period of spermatogenesis.  
7906 Therefore, longer exposure would not be expected to result in additional sensitivity and UF<sub>S</sub> = 1. The  
7907 cumulative UF is 30 based on UF<sub>A</sub> and UF<sub>H</sub> as described above. PODs from three developmental  
7908 toxicity studies in rats (Carney et al. 2006; Tinston 1994; Nelson et al. 1979) were derived. The  
7909 durations were sufficient to cover the developmental window, so UF<sub>S</sub> = 1 and cumulative UF= 30 based  
7910 on NOAELs from animals as previously described.  
7911

### 7912 **3.2.5.3.3 Cancer Slope Factor Derivation**

7913 This section provides details of the dose-response modeling carried out for developing cancer risk values  
7914 and is summarized from the EPA IRIS Assessment for PCE (U.S. EPA 2012c). This summary focuses  
7915 on hepatocellular tumors, the tumor type that was observed in all three animal bioassays and was the  
7916 basis of the cancer slope factors in the EPA IRIS Assessment for PCE (U.S. EPA 2012c). The steps  
7917 include estimation of dose metrics using relevant PBPK modeling, suitable adjustment to continuous  
7918 daily exposures from intermittent bioassay exposures, dose-response modeling in the range of  
7919 observation, interspecies extrapolation, extrapolation to low exposures, and route-to-extrapolation. An  
7920 overview of these steps is provided in Figure 3-2.  
7921

7922 As stated previously, the available evidence likely supports a complex MOA for PCE tumorigenesis,  
7923 with multiple contributing mechanisms of varying significance. Based on EPA's 2005 Guidelines for  
7924 Carcinogen Risk Assessment (U.S. EPA 2005a), a low-dose linear default approach is supported  
7925 because the "mode of action information is supportive of linearity or mode of action is not understood."  
7926 Therefore, EPA derived cancer PODs as an inhalation unit risk (IUR) and oral slope factor (OSF) based  
7927 on this linear modeling approach.





7929 **Figure 3-2. Sequence of steps for extrapolating from PCE bioassays in animals to human-**  
7930 **equivalent exposures expected to be associated with comparable cancer risk (combined**  
7931 **interspecies and route-to-route extrapolation).**

7932 Several metabolites of PCE are genotoxic both *in vivo and in vitro* (Section 3.2.3.2.1), and it is thought  
7933 that the hepatocarcinogenicity of the parent compound is mediated through the action of one or more of  
7934 its metabolites (Section 3.2.3.2.4). Oxidative metabolism is thought to predominate in the liver, and  
7935 TCA is the major resultant urinary excretion product. As discussed in Section 3.2.3.2.1, TCA appears to  
7936 be formed from spontaneous decomposition of trichloroacetyl chloride, which is known to bind to  
7937 macromolecules. Dichloroacetic acid (DCA) may be formed from dechlorination of TCA, but DCA  
7938 produced from this pathway is likely to be rapidly metabolized in the liver and not detected in blood or  
7939 urine. DCA that has been detected in urine is thought to be the result of kidney- specific  $\beta$ -lyase  
7940 metabolism of the results of GSH conjugation of PCE, and DCA produced from this pathway is  
7941 presumed to not play a role in liver toxicity or cancer. The potential role of GST conjugates of PCE in  
7942 liver carcinogenicity, although unknown, is presumed to be less important than the role of oxidative  
7943 metabolites.

7944  
7945 As described in ([U.S. EPA 2012c](#)) EPA modeled the JISA bioassay data ([JISA 1993](#)) for male and  
7946 female mice using the dose metrics of total liver oxidative metabolism, PCE AUC, and TCA AUC in  
7947 blood. Total liver oxidative metabolism is considered the most relevant dose-metric for liver cancer and  
7948 TCA AUC in liver was an alternative dose metric. Total liver oxidative metabolism was selected as the  
7949 primary dose metric over TCA AUC because while TCA is the major resultant urinary excretion product  
7950 of oxidative metabolism, TCA is not formed directly but instead from hydrolysis of trichloroacetyl  
7951 chloride (Section 3.2.3.2.4). Tumor phenotype data also suggest that TCA may not be the sole  
7952 tumorigenic metabolite of PCE, although the limited available data precludes any definitive conclusions.  
7953 PCE AUC in blood was considered the best dose metric for hemangiomas/ hemangiosarcomas in female  
7954 mice and MCL in both male and female rats. Modeling for both dose metrics generated fits for one-,  
7955 two-, and three-stage models (details for hepatocellular cancer in Appendix E). All model fits had  
7956 adequate goodness-of-fit p-values ( $p > 0.05$ ), and overall adequate fit. A summary of the results for  
7957 hepatocellular adenomas or carcinomas, hemangiomas/hemangiosarcomas, and MCL from JISA ([1993](#))  
7958 are shown in Table 3-6 based on the preferred dose metric. Extrapolation to humans using total  
7959 oxidative metabolism led to a  $BMD_{10}$  of 2.9, and its lower bound benchmark dose ( $BMDL_{10}$ ) was 1.4-  
7960 fold lower at  $2.1 \text{ mg/kg}^{3/4}$ -day liver oxidative metabolism. Linear extrapolation from the POD to low  
7961 internal dose, followed by conversion to human exposures, led to a human equivalent unit risk of  $1.8 \times$   
7962  $10^{-3}$  per ppm. Extrapolation to humans using TCA AUC in liver led to a human equivalent internal dose  
7963 POD ( $BMCL_{10}$ ) of 69 mg-hr/L-day TCA in blood. Linear extrapolation from the POD to low internal  
7964 dose, followed by conversion to human exposures, led to a human equivalent unit risk of  $1.5 \times 10^{-3}$  per  
7965 ppm, slightly lower than the estimate using total liver oxidative metabolism. Dose-response modeling of  
7966 the male mouse liver tumor data using administered exposure fit the data points similarly to when using  
7967 total oxidative metabolism or TCA AUC in liver (details in ([U.S. EPA 2012c](#))).  
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**Table 3-6. Human equivalent candidate unit risks, derived using PBPK-derived dose metrics and multistage model; tumor incidence data from JISA (1993) for hepatocellular adenomas or carcinomas**

Study Group	Tumor type (multistage model with all dose groups unless otherwise specified)	Human Equivalents				
		POD <sup>a</sup> in internal dose units and dose metric used			Candidate SF /internal dose unit <sup>b</sup>	Candidate IUR /ppm (PBPK range) <sup>c</sup>
Primary dose metrics						
Male mice JISA (1993)	Hepatocellular adenomas or carcinomas	BMD <sub>10</sub> BMDL <sub>10</sub>	2.9 2.1	Total liver oxidative metabolism, mg/kg0.75-d	49E-3	<b>1.8E-3</b> (1.6–1.8)
	Hemangiomas, hemangiosarcomas	BMD <sub>10</sub> BMDL <sub>10</sub>	63 34	PCE AUC in blood, mg-hr/L-d	2.9E-3	<b>5.9E-3</b> (5.9–6.9)
Female mice JISA (1993)	Hepatocellular adenomas or carcinomas	BMD <sub>10</sub> BMDL <sub>10</sub>	8.4 4.0	Total liver oxidative metabolism, mg/kg0.75-d	25E-3	<b>0.90E-3</b> (0.84–0.93)
Male rats JISA (1993)	MCL	BMD <sub>10</sub> BMDL <sub>10</sub>	46 30	PCE AUC in blood, mg-hr/L-d	3.4	<b>8.8</b> (6.8-8.0)
	MCL (Michaelis-Menten)	BMD <sub>10</sub> BMDL <sub>10</sub>	20 5.0	PCE AUC in blood, mg-hr/L-d	20	<b>40</b> (40-47)
Female rats JISA (1993)	MCL	BMD <sub>10</sub> BMDL <sub>10</sub>	136 61	PCE AUC in blood, mg-hr/L-d	1.6	<b>3.3</b> (3.3-3.9)
	MCL (control and low dose groups only)	BMD <sub>10</sub> BMDL <sub>10</sub>	11 5.2	PCE AUC in blood, mg-hr/L-d	19	<b>39</b> (39-45)
Female and male rats combined JISA (1993)	MCL (Michaelis-Menten)	BMD <sub>10</sub> BMDL <sub>10</sub>	17 3.0	PCE AUC in blood, mg-hr/L-d	33	<b>68</b> (67-71)

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Note: From Table 5-18 in the U.S. EPA (2012e) IRIS assessment of PCE; SF = Slope Factor; IUR = Inhalation Unit Risk; MCL= Mononuclear cell leukemias.

<sup>a</sup> PODs were estimated at the indicated BMRs in terms of extra risk; i.e., BMDL10 = lower bound for the level of the internal dose metric associated with 10% extra risk. Dose metric units are in the first column and include cross-species scaling to a human equivalent internal dose metric. Refer to Appendix D for dose-response modeling details.

<sup>b</sup> Slope Factor = BMR/BMDLBMR in units of risk per dose metric unit (as given in the first column).

<sup>c</sup> Inhalation unit risk (IUR) is given by the product of the slope factor in units of risk per dose metric unit and an inhalation dose metric conversion factor (DMCFppm): IUR = BMR/BMDLBMR × DMCFppm, where the DMCFppm is derived from the PBPK model.

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Human inhalation cancer risk was assessed using several different sex-specific animal tumor data sets and the PBPK model in U.S. EPA (2012e). These results, and their uncertainties are discussed in detail there.

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The majority of the National research Council (NRC) peer review panel for the IRIS assessment (U.S. EPA 2012e) recommended that the male mouse hepatocellular tumors be used for cancer risk estimation. Therefore, the primary inhalation unit risk is  $2 \times 10^{-3}$  per ppm or  $3 \times 10^{-7}$  per  $\mu\text{g}/\text{m}^3$  (rounding to one significant digit), based on the male mouse hepatocellular tumor data from the JISA (1993) bioassay. Some members of the NRC peer review panel recommended that the MCL data be

7991 used for cancer risk estimation. The inhalation unit risk would be  $7 \times 10^{-2}$  per ppm, or  $1 \times 10^{-5}$  per  
 7992  $\mu\text{g}/\text{m}^3$  (rounding to one significant digit) if it were based on the combined male and female rat MCL  
 7993 data, which provided increased statistical power and improved model fit compared to either sex alone.

7994 **3.2.5.4 Points of Departure for Human Health Hazard Endpoints and Confidence**  
 7995 **Levels**

7996 **Confidence Levels**

7997 For the acute endpoint, the value used in this risk evaluation is from Altmann et al. (1990), a medium  
 7998 quality short-term study demonstrating neurotoxicity based on impaired visual function associated with  
 7999 delayed neurological signaling. This endpoint is robustly supported by multiple human and animal  
 8000 studies. The data from Altmann et al. (1990) is based on 4 days of 4 hr/day exposure, so applying the  
 8001 dose-response analysis to a single day of exposure involves some uncertainty, however it is unlikely that  
 8002 outcomes would substantially differ between a single day and 4 days of exposure. Overall, there is  
 8003 medium-high confidence in this endpoint.

8004  
 8005 For chronic non-cancer endpoints, multiple endpoints are available representing the health domains of  
 8006 neurotoxicity, kidney toxicity, liver toxicity, immune toxicity, and reproductive/developmental toxicity.  
 8007 These endpoints are supported by data in both humans and animals and the range of PODs is within  
 8008 ~10-fold for most endpoints, although the full set of endpoints range by as much as 150-fold. Overall,  
 8009 there is medium-high confidence in the chronic endpoints.

8010  
 8011 For cancer, there is evidence of carcinogenicity in multiple tissues. The IUR (Inhalation Unit Risk) was  
 8012 developed from a High-quality animal study, however the limited available human data was ambiguous.  
 8013 Overall, there is medium confidence in the cancer endpoint.

8014  
 8015 **Table 3-7. Summary of PODs for Evaluating Human Health Non-Cancer Hazards from Acute**  
 8016 **Exposure Scenarios**

Target Organ System	Species - route	Human Equivalent Concentration (HEC)	Effect	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality
CNS	Humans - Inhalation	4 hrs/day = 10 ppm (68 mg/m <sup>3</sup> )	Neurotoxicity increased latencies for pattern reversal visual-evoked potentials	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=10</b>	Altmann et al. (1990)	Medium
		8 hrs/day = 5 ppm (34 mg/m <sup>3</sup> )				
		12 hrs/day = 3.3 ppm (22 mg/m <sup>3</sup> )				
		24 hrs/day = 1.7 ppm (11 mg/m <sup>3</sup> )				

8017  
 8018 **Best Representative Chronic Studies For Each Health Domain**

8019 From among all chronic studies, EPA selected the most robust studies or PODs from within each health  
 8020 domain to serve as representative endpoints for risk estimation. These studies are highlighted in blue in  
 8021 Table 3-8 below. There is High confidence in these robust PODs. Justification for the selections for each  
 8022 health domain are provided below:

8023  
 8024 **CNS (Neurotoxicity)**

8025 PODs were derived from two studies (Echeverria et al. 1995; Cavalleri et al. 1994) that both observed  
 8026 CNS effects presenting as visual deficits. Both studies scored a Medium in data quality and both studies  
 8027 are based on human data with equivalent cumulative UFs. Therefore, the midpoint of the range as

8028 derived in ([U.S. EPA 2012c](#)) is the best representative POD for this endpoint and the neurotoxicity  
8029 domain overall. EPA additionally derived occupational HECs for this POD, as described in Section  
8030 3.2.5.3.2. These HECs are provided in a separate row highlighted in green.

### 8031 ***Kidney Effects***

8032 While there was a Medium-quality human study that reported urinary markers of nephrotoxicity ([Mutti  
8033 et al. 1992](#)), this POD was derived from a LOAEL, which resulted in a cumulative UF of 100. The  
8034 rodent study by JISA ([1993](#)) score a High in data quality and only had a combined UF of 30, indicating  
8035 reduced uncertainty surrounding the POD. Therefore this study was used to represent the kidney  
8036 domain. There was no discernible difference among the mice and rat data from that study, so the POD  
8037 derived from mice was used in order to represent the most sensitive and robust endpoint.  
8038

### 8039 ***Liver Effects***

8040 Three studies provided sufficient dose-response information for liver effects in mice ([JISA 1993](#); [NTP  
8041 1986b](#); [Buben and O'Flaherty 1985](#)). Only the data from ([JISA 1993](#)) did not require a LOAEL-to-  
8042 NOAEL UF, and that study was additionally of High quality. Additionally, increased liver/body weight  
8043 ratio is not considered adverse on its own and may be due to induction of PPAR $\alpha$ , which is less active in  
8044 humans. Therefore, the POD from ([JISA 1993](#)) for increased angiectasis was selected to represent the  
8045 liver domain.  
8046

### 8047 ***Reproductive/Developmental***

#### 8048 ***Reproductive***

8049 There is only a single adequate study examining reproductive effects ([Beliles et al. 1980](#)), which  
8050 observed reduced sperm quality in males following only 5 days exposure. This study scored High in data  
8051 quality and was therefore used to represent reproductive effects. Of note, despite this study only  
8052 examining 5 days of exposure, this exposure duration covers the window of sperm production while the  
8053 observation period up to 10 weeks covered the full period of spermatogenesis. Since PCE is not  
8054 bioaccumulative, continuous exposure is not expected to result in a more sensitive toxicological  
8055 response.  
8056

#### 8057 ***Developmental***

8058 Three studies demonstrated adequate dose-response information for developmental endpoints, each  
8059 reporting varying but overlapping effects. Nelson et al. ([1979](#)) observed decreased weight gain in  
8060 offspring along with indications of developmental neurotoxicity. Tinston et al. ([1994](#)) reported neonatal  
8061 mortality as well as CNS effects in a multigenerational study. Carney et al. ([2006](#)) observed decreased  
8062 placental and fetal weight along with skeletal effects. Nelson et al. ([1979](#)) scored a low in data quality  
8063 while the other two studies scored a high. Among the two high-quality studies, the POD from ([Tinston  
8064 1994](#)) was selected to represent the domain because the data comes from a 2-generation study which  
8065 would be expected to capture all potential developmental outcomes, as opposed to the short-duration  
8066 study used in ([Carney et al. 2006](#)).  
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8068

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8070

**Table 3-8. Summary of PODs for Evaluating Human Health Non-Cancer Hazards from Chronic Exposure Scenarios**

Target Organ System	Species - route	Human Equivalent Concentration (HEC)	Effect	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality Score
CNS	Humans - Inhalation	2.2 ppm (15 mg/m <sup>3</sup> )	Neurotoxicity - Color confusion	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 UF <sub>S</sub> = 1 <b>Total UF=100</b>	Cavalleri et al. (1994)	Medium
	Humans - Inhalation (inferred)	8.3 ppm (56 mg/m <sup>3</sup> )	Visual reproduction, pattern memory, pattern recognition and reaction time in pattern memory	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 UF <sub>S</sub> = 1 <b>Total UF=100</b>	Echeverria et al. (1995)	Medium
	Humans - Inhalation	5.2 ppm (36 mg/m <sup>3</sup> )	Midpoint of the range of the two neurotoxicity studies	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 UF <sub>S</sub> = 1 <b>Total UF=100</b>	Based on U.S. EPA (2012c)	Medium
	Humans - Inhalation	14.5 ppm [8 hr] (99 mg/m <sup>3</sup> )	Midpoint of the range of the two neurotoxicity studies (adjusted for 8 and 12 hr occupational TWAs)	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 UF <sub>S</sub> = 1 <b>Total UF=100</b>	Based on U.S. EPA (2012c)	Medium
9.7 ppm [12 hr] (66 mg/m <sup>3</sup> )						
Kidney	Humans - Inhalation (inferred)	5.0 ppm (34 mg/m <sup>3</sup> )	Urinary markers of nephrotoxicity	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 UF <sub>S</sub> = 1 <b>Total UF=100</b>	Mutti et al. (1992)	Medium
	Rats - Inhalation	9.0 ppm (61 mg/m <sup>3</sup> )	Nuclear enlargement in proximal tubules	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 UF <sub>S</sub> = 1 <b>Total UF=30</b>	JISA (1993)	High
	Mice - Inhalation	2.1 ppm (14 mg/m <sup>3</sup> )	Nuclear enlargement in proximal tubules	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 UF <sub>S</sub> = 1 <b>Total UF=30</b>	JISA (1993)	High
Liver	Mice - Inhalation	31 ppm (210 mg/m <sup>3</sup> )	Increased angiectasis in liver	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 UF <sub>S</sub> = 1 <b>Total UF=30</b>	JISA (1993)	High
	Mice - Inhalation	310 ppm (2100 mg/m <sup>3</sup> )	Increased liver degeneration/necrosis	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =10 UF <sub>S</sub> = 1 <b>Total UF=300</b>	NTP (1986b)	High

Target Organ System	Species - route	Human Equivalent Concentration (HEC)	Effect	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality Score
	Mice - Oral (gavage)	40 ppm (270 mg/m <sup>3</sup> )	Increases liver/body-weight ratio	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =10 UF <sub>S</sub> = 10 <b>Total UF=3000</b>	Buben (1985)	Medium
Reproductive/ Developmental	Reproductive					
	Mice - Inhalation	21 ppm (140 mg/m <sup>3</sup> )	Reduced sperm quality following 5 days exposure	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 UF <sub>S</sub> = 1 <b>Total UF=30</b>	Beliles et al. (1980)	High
	Developmental					
	Rats	29 ppm (200 mg/m <sup>3</sup> )	Decreased weight gain; altered behavior, brain acetylcholine	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 UF <sub>S</sub> = 1 <b>Total UF=30</b>	Nelson et al. (1979)	Low
	Rats - Inhalation	18 ppm (122 mg/m <sup>3</sup> )	Increased F <sub>2A</sub> pup deaths by Day 29, CNS depression in F <sub>1</sub> and F <sub>2</sub>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 UF <sub>S</sub> = 1 <b>Total UF=30</b>	Tinston et al. (1994)	High
Rats - Inhalation	16 ppm (110 mg/m <sup>3</sup> )	Decreased fetal and placental weight, skeletal effects	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 UF <sub>S</sub> = 1 <b>Total UF=30</b>	Carney et al. (2006)	High	

Notes: Rows shaded in blue indicate PODs selected as most robust and representative for the associated health domain. Row shaded in green indicates occupational HECs for the chronic neurotoxicity domain.

As explained in Section 3.2.5.3.3, the primary IUR is derived from male mouse hepatocellular tumor data, while the alternative IUR is from combined male and female rat MCL data. Both values are shown in Table 3-9.

**Table 3-9. Summary of PODs for Evaluating Cancer Hazards from Chronic Inhalation Scenarios**

Exposure Duration for Risk Analysis	Hazard Value	Effect	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality Score
CHRONIC EXPOSURE	IUR 2 × 10 <sup>-3</sup> per ppm (3 × 10 <sup>-4</sup> per mg/m <sup>3</sup> )	male mouse hepatocellular tumors	Not applicable	JISA (1993)	High
	Alternate IUR: 7 × 10 <sup>-2</sup> per ppm (1 × 10 <sup>-2</sup> per mg/m <sup>3</sup> )	Male and female rat mononuclear cell leukemia (MCL)	Not applicable	JISA (1993)	High

8079 Notes:

8080 The inhalation unit risk should not be used with exposures exceeding 60 ppm, or 400 mg/m<sup>3</sup> (the equivalent ambient  
8081 exposures corresponding to the POD for male mouse hepatocellular tumors), because above this exposure level, the dose-  
8082 response relationship is not linear, and the unit risk would tend to overestimate risk.

8083 Cancer risks following acute exposures were not estimated. The relationship between a single short-term exposure to PCE  
8084 and the induction of cancer in humans is not known.  
8085

#### 8086 3.2.5.4.1 Route to Route Extrapolation for Dermal PODs

8087 Workers and consumers can be exposed to PCE under various exposure scenarios via dermal routes.  
8088 EPA did not identify toxicity studies by the dermal route that were adequate for dose-response  
8089 assessment. Dermal candidate values derived by two methods were compared and the results are shown  
8090 in Table 3-10. Dermal candidate values were calculated based on route-to-route extrapolation from two  
8091 different routes either inhalation or oral PODs. For all endpoints previously derived from animal or  
8092 human studies in the EPA IRIS Assessment ([U.S. EPA 2012c](#)), both oral and inhalation PODs (as HECs  
8093 or HEDs) were derived from the original study data using the best available approaches for  
8094 incorporating PCE specific toxicokinetic data (i.e. the PBPK model) when possible. Extrapolation to  
8095 oral HEDs was not available for all endpoints.  
8096

8097 Extrapolating from inhalation PODs to the dermal route account for human inhalation and body weight  
8098 and assume average exposure factors from the Exposure Factors Handbook ([U.S. EPA 2011a](#)) shown in  
8099 the equations below. Extrapolating from oral PODs to the dermal route considered differences in oral  
8100 and dermal absorption. EPA assumed 100% oral and inhalation absorption, supported by studies in  
8101 animals ([ATSDR 2019](#); [U.S. EPA 2012c](#)). EPA accounted for dermal absorption in the dermal exposure  
8102 estimate (see Section 2.4.1.29). Therefore, the oral HEDs were used directly for dermal exposures.  
8103

8104 Inhalation to dermal extrapolation for non-cancer effects:

8105 dermal POD = inhalation POD [mg/m<sup>3</sup>] × inhaled volume (m<sup>3</sup>) ÷ body weight (kg)  
8106

8107 Inhalation to dermal extrapolation for cancer effects:

8108 dermal slope factor = IUR [per mg/m<sup>3</sup>] ÷ inhaled volume (m<sup>3</sup>) × body weight (kg) ,  
8109

8110 where the inhaled volume was the ventilation rate 1.25 m<sup>3</sup>/hr (for light activity) times the  
8111 appropriate exposure duration (4 hours from Altmann et al. ([1990](#))) for acute endpoints, or 20 m<sup>3</sup> per  
8112 day for 24 hrs duration and the chronic endpoints and a body weight of 80 kg. These exposure factors  
8113 are based on EPA RfC Guidance ([U.S. EPA 1994c](#)) for inhalation rates and the 2011 Exposure Factors  
8114 Handbook ([U.S. EPA 2011a](#)) for body weight. EPA assumes that activities involving PCE exposure  
8115 involve some movement, and thus, assumed a ventilation rate for light activity.  
8116

8117 PODs were derived from Altmann et al. ([1990](#)) for a range of inhalation exposure durations, the route to  
8118 route extrapolation for dermal used the duration of the experimental study (4 hrs) and the air  
8119 concentration in the study (a NOAEC of 10 ppm or 68 mg/m<sup>3</sup>) for extrapolation to the dermal route.  
8120

8121 There is uncertainty regarding the likelihood that dermal exposure will result in cancer, but because  
8122 humans may experience different cancers than rodents, EPA has assumed that the slope factor can be  
8123 considered generally representative of the potential for cancers of other types and that this is relevant to  
8124 model via the dermal route. When both an HEC and HED value was available for a given endpoint, EPA  
8125 derived dermal PODs via extrapolation from both values. For all endpoints the difference in the derived  
8126 dermal POD between routes is no more than approximately 2-fold. In considering the relative



8127 uncertainties involved in extrapolation via either route, the most robust and sensitive POD was selected  
 8128 for use in risk estimation. The dermal POD value to be used for risk estimates is bold in the table below,  
 8129 and the selected representative studies are highlighted in blue, as was done for HEC values.  
 8130

8131 Differences in absorption across routes are accounted for in the occupational (Section 2.4.1.29) and  
 8132 consumer (Section 2.4.2.2.2) dermal exposure assessments, respectively. While EPA assumes 100%  
 8133 absorption via oral and inhalation routes (Section 3.2.2.1.1), the volatility of PCE significantly decreases  
 8134 the expected dermal absorption under non-occluded conditions. The occupational exposure estimates  
 8135 incorporated modeled absorption under non-occluded conditions through the *Dermal Exposure to*  
 8136 *Volatile Liquids Model* while consumer dermal exposure utilizes the permeability module from the  
 8137 Consumer Exposure Model (CEM) was used to estimate dermal exposure only for COUs under which  
 8138 impeded evaporation is expected.  
 8139  
 8140

**Table 3-10. Derivation of Dermal PODs by Route-to-Route Extrapolation**

Target Organ System and Effect	Inhalation POD and Duration	Inhalation to Dermal Adjustments	Inhalation to Dermal HED (mg/kg-day)	Oral to Dermal <sup>a</sup> HED (mg/kg-day)	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality
Acute Exposures							
CNS Neurotoxicity increased latencies for pattern reversal visual-evoked potentials	10 ppm (68 mg/m <sup>3</sup> ) 4 hrs/day	1.25 m <sup>3</sup> /hr 4 hrs/day 80 kg BW	<b>4.25<sup>b</sup></b>	N/A <sup>c</sup>	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=10</b>	Altmann et al. (1990)	Medium
Chronic Exposures							
CNS Neurotoxicity Color confusion	2.2 ppm (15 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	3.75	<b>2.6</b>	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 <b>Total UF=100</b>	Cavalleri et al. (1994)	Medium
CNS Neurotoxicity Visual reproduction, pattern memory, pattern recognition and reaction time in pattern memory	8.3 ppm (56 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	14	<b>9.7</b>	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 <b>Total UF=100</b>	Echeverria et al. (1995)	Medium
Midpoint of the range of the two neurotoxicity endpoints	5.2 ppm (36 mg/m <sup>3</sup> )	20 m <sup>3</sup> /day 80 kg BW	9.0	<b>6.2</b>	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 <b>Total UF=100</b>	Based on U.S. EPA (2012c)	Medium

Target Organ System and Effect	Inhalation POD and Duration	Inhalation to Dermal Adjustments	Inhalation to Dermal HED (mg/kg-day)	Oral to Dermal <sup>a</sup> HED (mg/kg-day)	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality
Kidney Urinary Markers of nephrotoxicity	5.0 ppm (34 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	8.5	<b>5.4</b>	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 <b>Total UF=100</b>	Mutti et al. (1992)	Medium
Kidney Nuclear enlargement in proximal tubules	9.0 ppm (61 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	15	<b>9.5</b>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	JISA (, 1993, 630653)	High
Kidney Nuclear enlargement in proximal tubules	2.1 ppm (14 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	3.5	<b>2.2</b>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	JISA (, 1993, 630653)	High
Liver Increased angiectasis in liver	31 ppm (210 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	52.5	<b>24.5</b>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	JISA (1993)	High
Liver Increased liver degeneration/ necrosis	310 ppm (2100 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	525	<b>252</b>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =10 <b>Total UF=300</b>	NTP (1986b)	High
Liver Increases liver/body-weight ratio	40 ppm (270 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	67.5	<b>32</b>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	Buben (1985)	Medium
Developmental Decreased weight gain; altered behavior, brain acetylcholine	29 ppm (200 mg/m <sup>3</sup> )	20 m <sup>3</sup> /day 80 kg BW	<b>50</b>	N/A	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	Nelson et al. (1979)	Low
Developmental Reduced sperm quality following 5 days exposure	21 ppm (140 mg/m <sup>3</sup> )	20 m <sup>3</sup> /day 80 kg BW	35	<b>22</b>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	Beliles et al. (1980)	High
Developmental Increased F <sub>2A</sub> pup deaths by Day 29, CNS depression in F <sub>1</sub> and F <sub>2</sub>	18 ppm (122 mg/m <sup>3</sup> )	20 m <sup>3</sup> /day 80 kg BW	<b>31</b>	N/A	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	Tinston et al. (1994)	High

Target Organ System and Effect	Inhalation POD and Duration	Inhalation to Dermal Adjustments	Inhalation to Dermal HED (mg/kg-day)	Oral to Dermal <sup>a</sup> HED (mg/kg-day)	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality
Developmental Decreased fetal and placental weight, skeletal effects	16 ppm (110 mg/m <sup>3</sup> )	20 m <sup>3</sup> /day 80 kg BW	<b>28</b>	N/A	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	Carney et al. (2006)	High
Cancer							
male mouse hepatocellular tumors	3 × 10 <sup>-4</sup> per mg/m <sup>3</sup>	20 m <sup>3</sup> /day 80 kg BW	1 × 10 <sup>-3</sup> per mg/kg/day	<b>2 × 10<sup>-3</sup> per mg/kg/day</b>	Not applicable	JISA (1993)	High
Male and female rat MCL	1 × 10 <sup>-2</sup> per mg/m <sup>3</sup>	20 m <sup>3</sup> /day 80 kg BW	4 × 10 <sup>-2</sup> per mg/kg/day	6 × 10 <sup>-2</sup> per mg/kg/day	Not applicable	JISA (1993)	High

Notes:

<sup>a</sup> The oral to dermal slope factors should not be used with exposures exceeding 50 mg/kg/day (the equivalent ambient exposures corresponding to the POD for male mouse hepatocellular tumors), because above this exposure level, the dose-response relationship is not linear, and the unit risk would tend to overestimate risk.

<sup>b</sup> The PODs highlighted in bold are used in calculating risks

<sup>c</sup> N/A an acute oral to dermal POD was not calculated since an acute oral POD was not identified and the inhalation to dermal POD was used for assessing risk from dermal exposures

Note: Cancer risks following acute exposures were not estimated. The relationship between a single short-term exposure to PCE and the induction of cancer in humans is not known.

### 3.2.6 Key Assumptions and Uncertainties for Human Health Hazard

#### 3.2.6.1 Hazard ID and Weight of Scientific Evidence

There is medium-high confidence in the database and WOE determinations for human health hazard. All but one of the studies considered for dose-response analysis scored either Medium or High in data quality evaluation and were determined to be highly relevant to the pertinent health outcome. EPA selected the best representative chronic study for each identified endpoint to use for risk estimation, taking into account factors such as data quality evaluation score, species, cumulative uncertainty factor, and relevance. The only study considered for dose-response analysis that scored a Low in data evaluation was (Nelson et al. 1979), however the health outcomes observed in this study were covered by the other two high-quality developmental toxicity studies, (Tinston 1994) and (Carney et al. 2006).

For most health domains, the weight of scientific evidence was very clear, with consistent results observed across multiple species and representing multiple endpoints within the health domain. The data was a bit more ambiguous for immune and hematological effects however. While there was some indication of specific endpoints related to immunotoxicity or blood effects, EPA determined that the database was not fully consistent and there was an absence of adequate quantitative information available to conclude that the domains supported dose-response analysis (Section 0). There is uncertainty whether the PODs for other endpoints carried forward are sufficiently protective of any potential immune or hematological effects that were not accounted for in this risk evaluation. Additionally, there is some uncertainty as to the weight of the evidence for liver effects relating to human relevance. Consistent effects were only observed in rodents and the potential influence of certain MOA that are more highly active in rodents (i.e. PPAR $\alpha$ , Section 3.2.3.2.4) suggests that observed liver

8172 toxicity may have reduced significance to the majority of human populations. However, susceptible  
8173 subpopulations such as those with liver disease (Section 3.2.5.2) may still be of high risk of liver toxicity  
8174 from sustained PCE exposure.

### 8175 **3.2.6.2 Derivation of PODs, UFs, and PBPK Results**

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8176 Conceptually, the POD should represent the maximum exposure level at which there is no appreciable  
8177 risk for an adverse effect in the study population under study conditions (i.e., the threshold in the dose-  
8178 response relationship). In fact, it is not possible to know that exact exposure level even for a laboratory  
8179 study because of experimental limitations (e.g. the ability to detect an effect, the doses used and dose  
8180 spacing, measurement errors, etc.), and POD approximations like the doses used (i.e., a NOAEL) an  
8181 exposure level which is modeled from the reasonably available doses used (i.e., BMDL) are used. The  
8182 application of UFs is intended to account for this uncertainty/variability to allow for estimating risk for  
8183 sensitive human subgroups exposed continuously for a lifetime. While the selection of UFs is informed  
8184 by reasonably available data, the true necessary extent of adjustment most appropriate for capturing all  
8185 relevant uncertainty and variability is unknown.

8186  
8187 For this draft risk evaluation, non-cancer PODs were all based on NOAELs and LOAELs because the  
8188 data for the selected endpoints was unable to be BMD modeled. This results in reduced precision in  
8189 POD estimates because the POD is dependent on the dose selection of the study as opposed to the  
8190 response rate/level for the effect of interest.

8191  
8192 For each of these types of PODs, there are additional uncertainties pertaining to adjustments to the  
8193 administered exposures (doses). Typically, administered exposures (doses) are converted to equivalent  
8194 continuous exposures (daily doses) over the study exposure period under the assumption that the effects  
8195 are related to concentration  $\times$  time, independent of the daily (or weekly) exposure regimen (i.e., a daily  
8196 exposure of 6 hours to 4 ppm is considered equivalent to 24 hours of exposure to 1 ppm). However, the  
8197 validity of this assumption is generally unknown, and, if there are dose-rate effects, the assumption of  $C$   
8198  $\times t$  equivalence would tend to bias the POD downwards.

8199  
8200 For the PBPK analyses in this assessment (Section 3.2.2.2), the actual administered exposures are taken  
8201 into account in the PBPK modeling, and equivalent daily values (averaged over the study exposure  
8202 period) for the dose-metrics are obtained. EPA determined that the peer-reviewed PBPK model  
8203 sufficiently accounted for any variability and uncertainties in route-to-route extrapolation, and therefore  
8204 inhalation and oral data were considered equivalently relevant. Nonetheless, this PBPK model, like any  
8205 model, does not incorporate all possible sources of biological uncertainty or variability.

8206  
8207 Use of the PBPK model resulted in data derived HEC and HED values replacing default assumptions  
8208 and uncertainty factors that would have otherwise been used such as allometric scaling and a  $UF_{TK}$  of 3  
8209 in accounting for interspecies toxicokinetic variability. Data-derived values are always preferred to  
8210 default uncertainty adjustments and improve confidence in the adjusted PODs. There is additional  
8211 uncertainty for dermal PODs which required route-to-route extrapolation based on assumed exposure  
8212 factors without the availability of a dermal compartment in the PBPK model.

### 8213 **3.2.6.3 Cancer Dose-Response**

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8214 There is uncertainty concerning the selected POD for cancer dose-response. EPA derived an IUR and  
8215 dermal SF based on the low dose linear assumption. The MOA (Section 3.2.3.2.4) concludes that  
8216 genotoxicity is likely to be at least a partial contributor to the MOA and any non-mutagenic mechanisms  
8217 for carcinogenesis that would be associated with a threshold are likely only relevant at higher doses

8218 above those associated with tumorigenesis. Nonetheless, the linear assumption always has some inherent  
8219 uncertainty.

8220  
8221 Additionally, EPA selected the male mouse data for hepatocellular adenoma/carcinoma to use as the  
8222 representative cancer POD based on the majority recommendation from the NRC peer review panel of  
8223 the IRIS Assessment ([U.S. EPA 2012e](#)) (Section 3.2.5.3.3). This is further supported based on a stronger  
8224 weight of evidence for liver effects compared to immune outcomes. However, the NRC panel was not  
8225 unanimous and some members believed that the MCL data was better representative. The MCL IUR for  
8226 the combined male and female dataset is 35x higher than the hepatocellular cancer IUR selected for use  
8227 as the representative cancer POD. An adjustment was not made to account for the additional risk from  
8228 MCL or hemangiomas and therefore the selected cancer POD may underestimate total cancer risk from  
8229 PCE.

#### 8230 **3.2.6.4 Confidence Ratings for Endpoints and Selected Representative PODs**

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8231 There is medium-high confidence in the acute non-cancer endpoint and POD based on neurotoxicity,  
8232 medium-high confidence in the chronic non-cancer endpoints and PODs, and medium confidence in the  
8233 cancer endpoint. There is high confidence in the robust chronic non-cancer PODs selected to represent  
8234 each health domain for risk estimation. Confidence ratings are a half-step lower (e.g. medium instead of  
8235 medium-high) for all dermal PODs because derivation required extrapolation across routes without the  
8236 availability of a PBPK model dermal compartment. See Section 3.2.5.4 for more details on the  
8237 confidence descriptions for each category.

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## 4 RISK CHARACTERIZATION

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### 4.1 Environmental Risk

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EPA took fate, exposure, and environmental hazard into consideration to characterize environmental risk of PCE. As stated in Section 2.1, PCE has low potential to bioconcentrate in biota and moderate potential to accumulate in wastewater biosolids, soil, or sediment. Releases of PCE to the environment are likely to volatilize to the atmosphere, where it will slowly photooxidize. It may migrate to groundwater, where it will slowly hydrolyze. Additionally, the bioconcentration potential of PCE is low. EPA modeled environmental exposure with surface water concentrations of PCE ranging from 9.7E-09 ppb to 2,034 ppb from facilities releasing the chemical to surface water. Measured surface water concentrations in ambient water range from below the detection limit to 1.7 ppb. The modeled data represents estimated concentrations near facilities that are actively releasing PCE to surface water, while the reported measured concentrations represent sampled ambient water concentrations of PCE. Differences in magnitude between modeled and measured concentrations may be due to measured concentrations not being geographically or temporally close to known releasers of PCE.

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As stated in Section Summary of Environmental Hazard 3.1.5, EPA concludes that PCE poses a hazard to environmental aquatic receptors to include: aquatic invertebrates, fish, and aquatic plants. The most sensitive species for acute toxicity were two daphnid species, *Ceriodaphnia dubia* and *Daphnia magna*. The acute toxicity value was as low as 2.5 mg/L based on immobilization of daphnia. PCE presents an acute hazard to fish based on mortality of rainbow trout as the most sensitive species with acute toxicity values as low as 4.8 mg/L for mortality LC<sub>50</sub>. For chronic exposures, PCE is a hazard to aquatic invertebrates, with a chronic toxicity value of 0.5 mg/L; and a chronic toxicity value of 0.8 mg/L for fish. PCE is also a hazard for green microalgae with toxicity values as low as 2.0E-02 mg/L.

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EPA assigned an overall quality level of high, medium or low to 30 acceptable studies. These studies contained relevant aquatic toxicity data for fish, aquatic invertebrates, and aquatic plants. As shown in Table 3-1, EPA identified 10 aquatic toxicity studies as the most relevant for quantitative assessment. Four of the 10 studies were carried forward for characterizing the potential environmental risks from PCE. The rationale for selecting these studies is provided in Section 3.1.3 Weight of Scientific Evidence.

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A total of 10 acceptable aquatic environmental hazard studies were identified for PCE. EPA assigned nine high, and one medium for overall quality levels during data evaluation (See Table 3-1 in Section 3.1.2 and the *Draft Risk Evaluation for Perchloroethylene: Systematic Review Supplemental File: Data Quality Evaluation of Environmental Hazard Studies* ([U.S. EPA 2020i](#))). The *Draft Risk Evaluation for Perchloroethylene: Systematic Review Supplemental File: Data Quality Evaluation of Environmental Hazard Studies* ([U.S. EPA 2020i](#)) presents details of the data evaluations for each study, including scores for each metric and the overall study score.

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Given PCE's conditions of use under TSCA outlined in problem formulation ([U.S. EPA 2018d](#)), EPA determined that environmental exposures are expected for aquatic species, and risk estimation is discussed in Section 4.1.2.

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#### 4.1.1 Risk Estimation Approach

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To assess environmental risk, EPA evaluates environmental hazard and exposure data. EPA used modeled exposure data from E-FAST ([U.S. EPA 2014b](#)), as well as monitored data from the WQP ([Nwqmc 2017](#)), to characterize the exposure of PCE to aquatic species. Environmental risks are estimated by calculating a risk quotients (RQ). As stated previously, modeled data were used to represent surface water concentrations near facilities actively releasing PCE to surface water. The modeled concentrations were used to represent ambient water concentrations of PCE. RQs were calculated using surface water concentrations and the COCs calculated in the hazard section of this document (Section 3.1.4). The RQ is defined as:

$$\text{RQ} = \text{Predicted Environmental Concentration} / \text{Effect Level or COC}$$

RQs equal to 1 indicate that environmental exposures are the same as the COC. If the RQ is above 1, the exposure is greater than the COC. If the RQ is below 1, the exposure is less than the COC. The COCs for aquatic invertebrates and algae shown in Table 3-2, and the environmental concentrations described in Table 4-1, were used to calculate RQs ([U.S. EPA 1998](#)).

EPA considered the biological relevance of the species that the COCs were based on when integrating the COCs with the location of surface water concentration data to produce RQs. For example, certain biological factors affect the potential for adverse effects in aquatic organisms. Life-history and the habitat of aquatic organisms influences the likelihood of exposure above the hazard benchmark in an aquatic environment.

Frequency and duration of exposure also affect the potential for adverse effects in aquatic organisms. Therefore, the number of days that a COC was exceeded was also calculated using E-FAST ([U.S. EPA 2014b](#)), as described in Section 2.3.1.2. The days of exceedance modeled in E-FAST are not necessarily consecutive and could occur sporadically throughout the year. continuous aquatic exposures are more likely for the longer exposure scenarios (i.e., 100-365 days/yr of exceedance of a COC), and more of an interval or pulse exposure for shorter exposure scenarios (i.e., 1-99 days/yr of exceedances of a COC).

#### **Calculation of Days of COC Exceedance**

The Probabilistic Dilution Model (PDM) portion of E-FAST 2014 ([U.S. EPA 2014b](#)) was also run for free-flowing water bodies, which predicts the number of days per year a chemical's concentration of concern (COC) in an ambient water body will be exceeded. The model is based on a simple mass balance approach presented by Di Toro ([1984](#)) that uses probability distributions as inputs to reflect that streams follow a highly variable seasonal flow pattern and there are numerous variables in a manufacturing process can affect the chemical concentration and flow rate of the effluent. PDM does not estimate exceedances for chemicals discharged to still waters, such as lakes, bays, or estuaries. For these water bodies, the days of exceedance is assumed be zero unless the predicted surface water concentration exceeds the COC. In these cases, the days of exceedance is set to the number of release days per year (see required inputs below).

#### **Geospatial Analysis**

A geospatial analysis at the watershed level (HUC-8 and HUC-12) was conducted to compare the measured and predicted surface water concentrations in 2016 and investigate if the facility releases may be associated with the observed concentrations in surface water. A geographic distribution of the

concentrations is shown in Figure 4-1 and Figure 4-2 (east and west U.S.) for the maximum days of release scenario, and in Figure 4-3 and Figure 4-4 (east and west U.S.) for the 20-days of release scenario. Overall, there are 33 U.S. states/territories with either a measured concentration or a predicted concentration; at the watershed level, there are 109 HUC-8 areas and 149 HUC-12 areas with either measured or predicted concentrations. 5.3.68 Appendix D provides a list of states/territories with facility releases (as mapped) and/or monitoring sites.

EPA also used surface water monitoring data from the Water Quality Portal ([Nwqmc 2017](#)) and from the published literature to characterize the risk of PCE to aquatic organisms. These monitored surface water concentrations reflect concentrations of PCE in ambient water. EPA’s Storage and Retrieval (STORET) data and USGS’s National Water Information System (NWIS) data were extracted on Oct 3<sup>rd</sup>, 2018 from the WQP. These data show an average concentration for PCE of  $0.2 \pm 0.6 \mu\text{g/L}$  or ppb in surface water from 1,597 measurements taken throughout the U.S. between 2013 and 2017. The highest value recorded during these years was  $1.7 \mu\text{g/L}$  or ppb, which was measured in 2014. Table 4-1 shows that algae RQ were greater 1 at the maximum observed concentration. All other RQs were close to zero.

**Table 4-1. RQs Calculated using Monitored Environmental Concentrations from Water Quality Portal**

Monitored Surface Water Concentrations (ppb) from 2013-2017	RQ using Acute COC of 1,342 ppb	RQ using Chronic COC of 50 ppb	RQ using algae COC of 1.4 ppb
Mean (SD): 0.23 (0.55) ppb	0.0	0.0	0.2
Maximum: 1.69 ppb	0.0	0.0	1.2

**Surface Water Concentrations**

The surface water concentrations associated with the monitoring stations and facility releases are denoted on the maps using COCs (Section 3.1.4) to determine the concentration thresholds:

- Red**  $\geq 1,342 \mu\text{g/L}$  (exceeds all COC for algae, aquatic invertebrate, and fish)
- orange**  $50-1,341 \mu\text{g/L}$  (exceeds the COC for algae and aquatic invertebrate, but not for fish)
- green**  $1.4$  to  $49 \mu\text{g/L}$  (exceeds the COC for algae, but not for aquatic invertebrate or fish)
- blue** Detected, but less than  $1.4 \mu\text{g/L}$  (less than all COC)
- purple** Not Detected (applies only to measured concentrations; detection limits vary)

For the predicted concentrations, the concentrations represent conditions under low flow conditions (i.e., 7Q10 flows). The harmonic mean concentrations were not mapped but are presented in the detailed summary tables.

**Symbols and Layering**



8361 Due to the scale of the maps found in Section 4, some symbols may overlap each other if the monitoring  
8362 stations and facilities are near each other or there are multiple releases modeled for the same facility  
8363 (i.e., one facility is both a direct discharger and a receiving facility). As such, the maps are layered to  
8364 make sure that the most important information is always be visible. The following rules were applied:

8365

8366 • Monitoring stations (small circles) are always on top of indirect discharge releases (medium  
8367 triangles), which are always on top of direct discharge releases (large squares), and

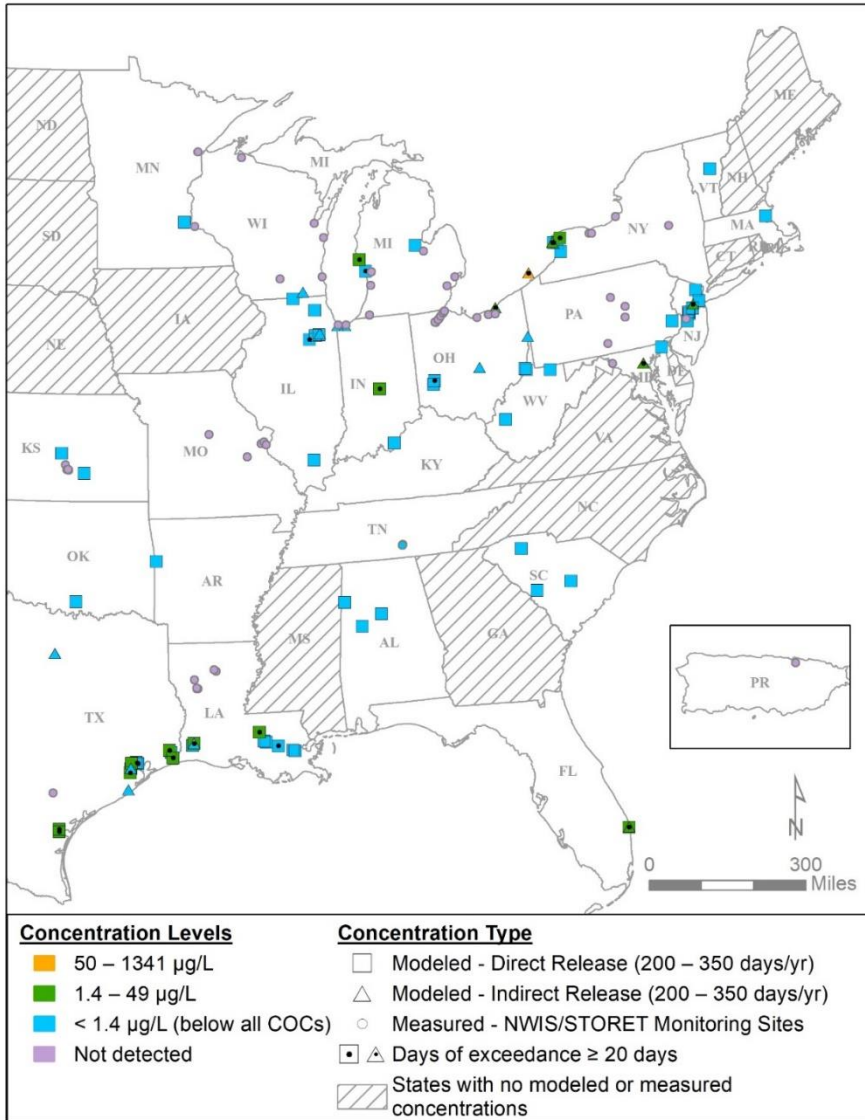
8368

8369 • Within each symbol type (monitoring station, direct release, and indirect release), a higher  
8370 concentration level is always on top of a lower concentration level (i.e., from top to bottom:  
8371  $\geq 1,342$   $\mu\text{g/L}$  (red), 50-1,341  $\mu\text{g/L}$  (orange), 1.4-49  $\mu\text{g/L}$  (green),  $< 1.4$   $\mu\text{g/L}$  (blue), and not  
8372 detected (purple).

8373

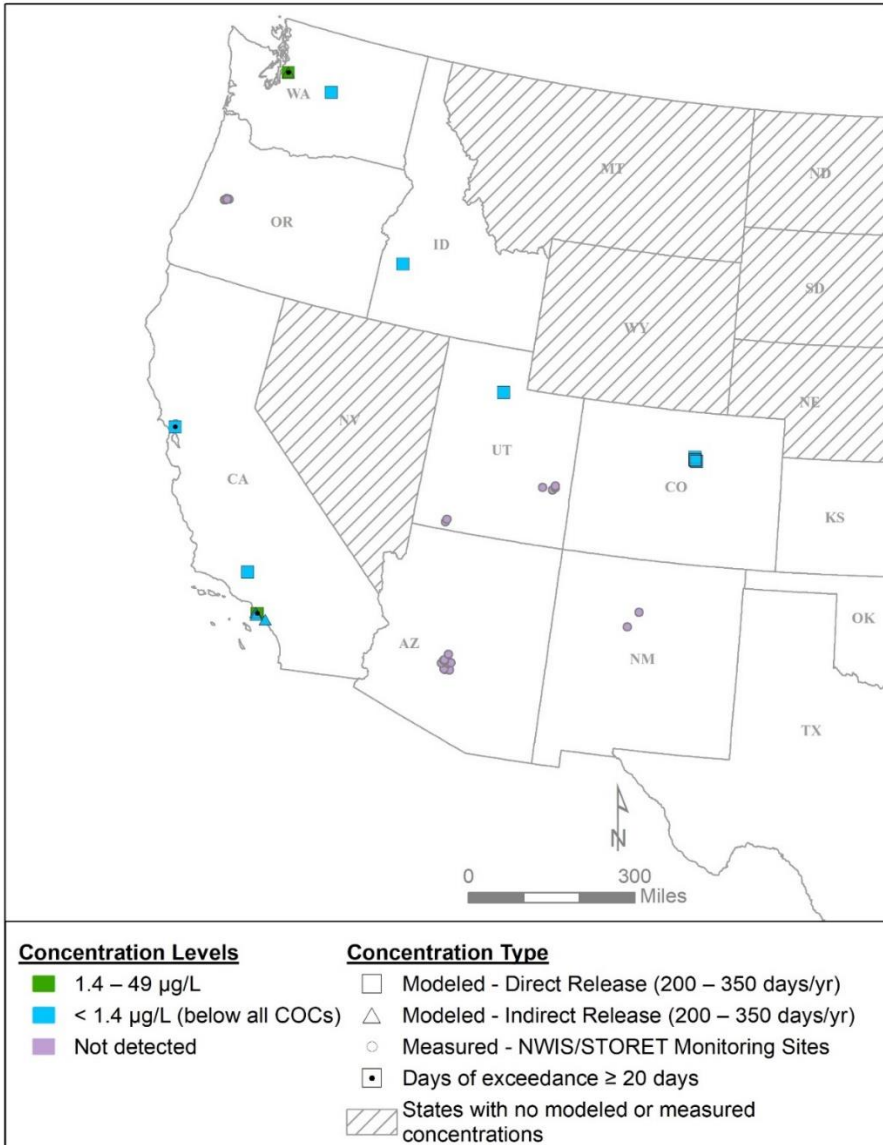
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**Figure 4-1** Concentrations of PCE from PCE-Releasing Facilities (Maximum Days of Release Scenario) and WQX Monitoring Stations: Year 2016, East US. All indirect releases are mapped at the receiving facility unless the receiving.



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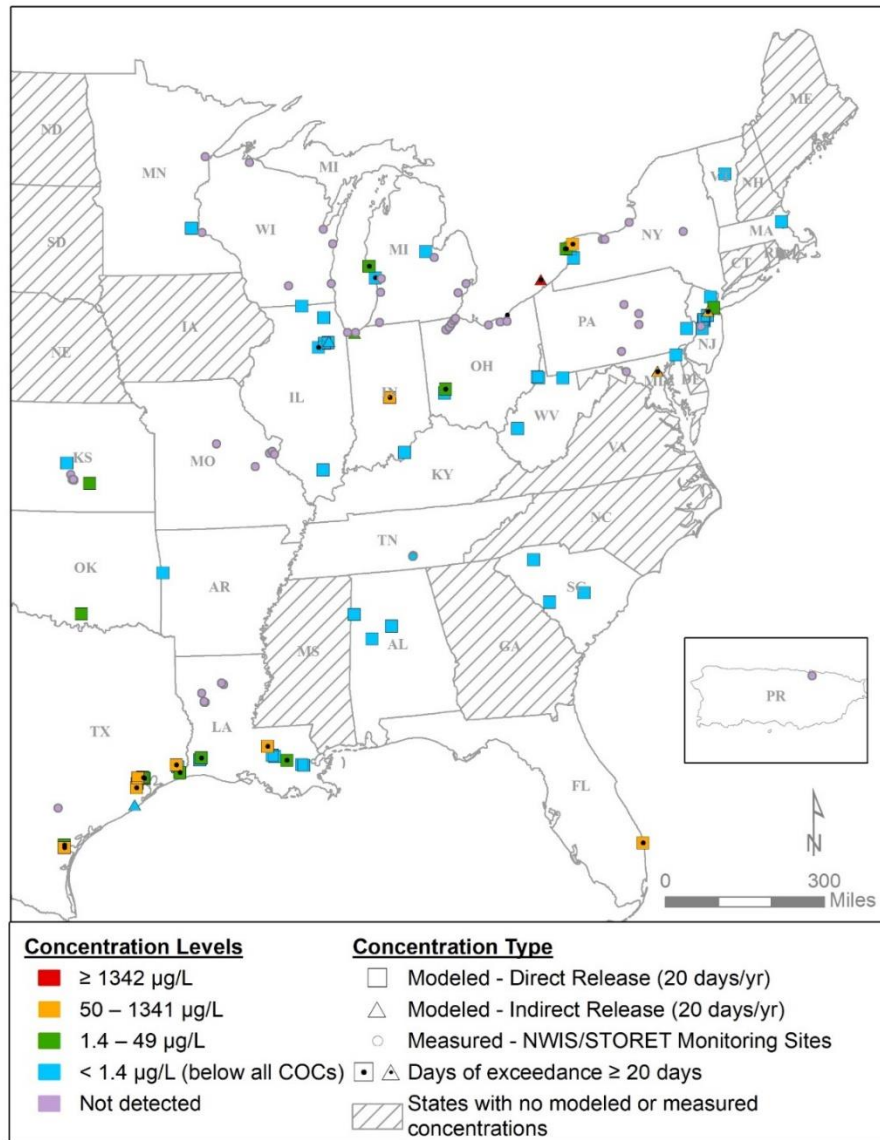
**Figure 4-2** Concentrations of PCE from PCE-Releasing Facilities (Maximum Days of Release Scenario) and WQX Monitoring Stations: Year 2016, West US. All indirect releases are mapped at the receiving facility unless the receiving facility is unknown.



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**Figure 4-3.** Concentrations of PCE from PCE-Releasing Facilities (20 Days of Release Scenario) and WQX Monitoring Stations: Year 2016, East US. All indirect releases are mapped at the receiving facility unless the receiving facility is unknown.



8386



#### 4.1.2 Risk Estimation for Aquatic Environment

To characterize potential risk due to PCE exposure, RQs were calculated based on modeled data from E-FAST (U.S. EPA 2014b) for sites that had surface water discharges of PCE according to TRI and DMR data (Table 4-1). Surface water concentrations of PCE were modeled for 97 releases: six manufacturing releases, four import/repackaging, 18 processing as a reactant releases, four incorporation into formulation, 17 open top vapor degreasing releases, two industrial dry cleaning releases, One commercial dry cleaning release (based on data from 12,822 facilities), five maskants for chemical milling releases, 12 industrial processing aid releases, eight other industrial use releases, seven other commercial uses releases, and 13 waste handling, disposal, treatment, and recycling releases. Direct releases facilities (releasees from an active facility directly to surface water) were modeled with two scenarios based on high-end and low-end days of release. Indirect facilities (transfer of wastewater from an active facility to a receiving POTW or non-POTW WWTP) were only modeled with a high-end days of releases scenario. As stated in Section 2.3.1.1, the maximum releases frequency (200 to 365 days) is based on release estimates specific to the facility's condition of use and the low-end releases frequency (20 days) is an estimate of releases that could lead to chronic risk for aquatic organisms.

As stated previously, the frequency and duration of exposure affects potential for adverse effects in aquatic organisms. Therefore, the number of days a COC was exceeded was also calculated using E-FAST. Facilities with RQs and days of exceedance that indicate risk for aquatic organisms (facilities with an acute  $RQ \geq 1$ , or a chronic or algae  $RQ \geq 1$  and 20 days or more of exceedance for the chronic or algae COC) are presented in Table 4-110.

#### Confidence in Risk Estimation for Aquatic Environment

Confidence ratings for aquatic exposure scenarios are informed by uncertainties surrounding inputs and approaches used in modeling surface water concentrations. Other considerations that impact confidence in the aquatic exposure scenarios include the model used (E-FAST 2014, (U.S. EPA 2014b)) and its associated default and user-selected values and related uncertainties. As described in Section 2.3.4.4, there are uncertainties related to the ability of E-FAST 2014 (U.S. EPA 2014b) to incorporate downstream fate and transport; the likely number of release days from given discharging facilities; and in some cases (i.e., when the NPDES for the discharging facility cannot be found within the E-FAST database), the applied stream flow distribution. Based on the data quality, uncertainties, and weight of scientific evidence, confidence in the surface water concentration estimate is medium.

Based on the data quality, weight of scientific evidence, and uncertainties, confidence in acute and chronic COCs for fish and invertebrates are high. The COC for algae is based on a single study that EPA assigned an overall quality level of medium. Additionally, algae species tend to vary widely in their sensitivity to chemical pollutants, and data were only available for three algal species and may not represent the most sensitive species at a given site. Therefore, confidence in algae COC is medium. The overall confidence in the risk estimate to aquatic organisms from exposure to PCE is medium based on the surface water PCE concentration and COC confidence levels.

#### Manufacturing

Six facilities were manufacturing PCE. Two of these facilities had  $RQs \geq 1$  and 20 days or more of exceedance for algae. Exceedances occurred using direct and indirect scenarios.

- Greenchem, West Palm Beach, FL: Using the scenario of 350 days of maximum direct release to surface water resulted in a surface water concentration of 18 ppb, algae had an  $RQ = 13$  and 189 days of exceedance, with average direct release concentration resulted in a surface water concentration of 5.6 ppb, algae had an  $RQ = 4.0$  and 100 days of exceedance. Using the

8439 maximum indirect release (80% removal) release scenario to surface water resulted in a surface  
8440 water concentration of 3.7 ppb, algae had an RQ = 2.7 and 77 days of exceedance.

- 8441 • Univar USA Inc, Redmond, WA: Using the scenario of 350 days of maximum direct release to  
8442 surface water resulted in a surface water concentration of 18 ppb, algae had an RQ = 13 and 189  
8443 days of exceedance. With average direct release concentration from 350 days of direct release  
8444 resulted in a surface water concentration of 5.6 ppb, algae had an RQ = 4.0 and 100 days of  
8445 exceedance. Using the maximum indirect release (80% removal) scenario to surface water  
8446 resulted in a surface water concentration of 3.7 ppb, algae had an RQ = 2.6 and 100 days of  
8447 exceedance.

8448 *Four of the six facilities in the Manufacturing COU did not have NPDES permits. Lack of a NPDES*  
8449 *permit increases the uncertainty in the surface water release estimate for those facilities. EPA identified*  
8450 *risk to algae from direct and indirect release of PCE to surface water from two of the facilities without*  
8451 *NPDES permits. Based on the data quality, uncertainties and weight of scientific evidence, confidence in*  
8452 *the risk estimate is medium.*

### 8453 **Import/Repackaging**

8454 Of the four facilities importing/repackaging PCE, a single facility, Hubbard-Hall Inc, Waterbury, CT,  
8455 had RQs  $\geq 1$  and 20 days or more of exceedance for algae. Using the scenario of 250 days of indirect  
8456 release (80% removal) to surface water resulted in a surface water concentration of 29 ppb, algae had an  
8457 RQ = 21 and 230 days of exceedance. Using the scenario of 20 days of indirect release (80% removal) to  
8458 surface water resulted in a surface water concentration of 360 ppb, algae had an RQ = 257 and 20 days  
8459 of exceedance.  
8460

8461 *EPA identified risk to algae with 80% PCE removal from waste water treatment at one of the four*  
8462 *facilities in the Import/Repackaging COU. Indicating that with the Import/Repackaging COU, risk to*  
8463 *algae can exist even with waste water treatment if the rate of PCE release to surface water is high. This*  
8464 *was also the only facility lacking a NPDES permit which increases the uncertainty associated with the*  
8465 *surface water release estimate. Based on the data quality, uncertainties and weight of scientific*  
8466 *evidence, confidence in the risk estimate is medium.*

### 8467 **Processing as a Reactant**

8468 Of the 18 facilities processing PCE as a reactant, six facilities had RQs  $\geq 1$  and 20 days or more of  
8469 exceedance for aquatic organisms. All exceedances occurred using the direct release to surface water  
8470 scenario.  
8471

- 8472 • Dupont-Chemours Montague Site, Montague, MI: Using the scenario of 350 days of direct  
8473 release to still surface water resulted in a surface water concentration of 2.4 ppb, algae had an  
8474 RQ = 1.7 and 350 days of exceedance. Using the scenario of 20 days of direct release to still  
8475 surface water resulted in a surface water concentration of 35 ppb, algae had an RQ = 25 and 20  
8476 days of exceedance.
- 8477 • Eagle U.S. 2 LLC - Lake Charles Complex, Lake Charles, LA: Using the scenario of 350 days of  
8478 direct release to surface water resulted in a surface water concentration of 1.5 ppb, algae had an  
8479 RQ = 1.1 and 29 days of exceedance.
- 8480 • Flint Hills Resources Corpus Christi LLC - West Plant, Corpus Christi, TX: Using the scenario  
8481 of 350 days of direct release to still surface water resulted in a surface water concentration of 3.0  
8482 ppb, algae had an RQ = 2.2 and 350 days of exceedance. Using the scenario of 20 days of direct  
8483 release to still surface water resulted in a surface water concentration of 52 ppb, algae had an RQ

8484 = 37 and 20 days of exceedance, and aquatic invertebrates had a chronic RQ = 1.0 and 20 days of  
8485 exceedance.

- 8486 • Honeywell International Inc-Baton Rouge Plant, Baton Rouge, LA: Using the scenario of 350  
8487 days of direct release to surface water resulted in a surface water concentration of 4.9 ppb, algae  
8488 had an RQ = 3.5 and 193 days of exceedance. Using the scenario of 20 days of direct release to  
8489 surface water resulted in a surface water concentration of 85 ppb, algae had an RQ = 61 and 20  
8490 days of exceedance.
- 8491 • Keeshan And Bost Chemical Co., Inc., Manvel, TX: Using the scenario of 350 days of direct  
8492 release to still surface water resulted in a surface water concentration of 5.0 ppb, algae had an  
8493 RQ = 3.6 and 350 days of exceedance. Using the scenario of 20 days of direct release to still  
8494 surface water resulted in a surface water concentration of 100 ppb, algae had an RQ = 71 and 20  
8495 days of exceedance, and aquatic invertebrates had a chronic RQ = 2.0 and 20 days of  
8496 exceedance.
- 8497 • Premcor Refining Group Inc Port Arthur, Port Arthur, TX: Using the scenario of 350 days of  
8498 direct release to surface water resulted in a surface water concentration of 2.0 ppb, algae had an  
8499 RQ = 1.4 and 67 days of exceedance.

8500 *EPA identified risk to algae and a chronic risk to aquatic organisms from direct release of PCE to*  
8501 *surface water from the Processing as a Reactant COU at six facilities. Based on the data quality,*  
8502 *uncertainties and weight of scientific evidence, confidence in the risk estimate is medium.*  
8503

#### 8504 **Incorporation into Formulation**

8505 Of the four facilities using PCE for incorporation into formulations, a single facility, Lord Corp,  
8506 Saegertown, PA, had RQs  $\geq 1$  for acute risks, and RQs  $\geq 1$  and 20 days or more of exceedance for  
8507 chronic and algae risks. Using the scenario of 300 days of indirect release (80% removal) to surface  
8508 water resulted in a surface water concentration of 136 ppb, algae had an RQ = 97 and 299 days of  
8509 exceedance, and aquatic invertebrates had a chronic RQ = 2.7 and 127 days of exceedance. Using the  
8510 scenario of 20 days of indirect release (80% removal) to surface water resulted in a surface water  
8511 concentration of 2034 ppb, algae had an RQ = 1,453 and 20 days of exceedance, aquatic invertebrates  
8512 had an acute RQ = 1.5 and a chronic RQ = 41 with 20 days of exceedance.

8513 *EPA identified elevated acute and chronic risk to aquatic organisms from direct release of PCE to*  
8514 *surface water from the Incorporation into Formulation COU at a single facility. The facility showing*  
8515 *risk has a NPDES permit. However, one of the facilities that was not identified with risk lacked a*  
8516 *NPDES permit. Based on the data quality, uncertainties and weight of scientific evidence, confidence in*  
8517 *the risk estimate is medium.*  
8518

#### 8519 **Open Top Vapor Degreasing**

8520 Of the 17 open-top vapor degreasing facilities, two facilities had RQs  $\geq 1$  and 20 days or more of  
8521 exceedance for algae.

- 8522 • Equistar Chemicals LP, La Porte, TX: Using the scenario of 20 days of direct release to still  
8523 surface water resulted in a surface water concentration of 3.2 ppb, algae had an RQ = 2.3 and 20  
8524 days of exceedance.
- 8525 • GM Components Holdings LLC, Lockport, NY: Using the scenario of 260 days of direct release  
8526 to surface water resulted in a surface water concentration of 5.9 ppb, algae had an RQ = 4.2 and



131 days of exceedance. Using the scenario of 20 days of direct release to surface water resulted in a surface water concentration of 78 ppb, algae had an RQ = 56 and 20 days of exceedance.

*EPA identified risk to algae from direct release of PCE to surface water from the Open Top Vapor Degreasing COU at two facilities. Based on the data quality, uncertainties and weight of scientific evidence, confidence in the risk estimate is medium.*

#### **Dry Cleaning (Industrial and Commercial)**

Two industrial and One commercial dry cleaning releases (based on data from 12,822 facilities) were modeled for the risk estimate. The model used both high-end and central tendency release data for direct and indirect releases. None of the facility releases show a surface water concentration that resulted in an RQs  $\geq 1$  for acute risk or RQs  $\geq 1$  and 20 days of exceedance for chronic or algal risk.

*No risks were identified for aquatic organisms with this COU. Based on the data quality, uncertainties and weight of scientific evidence, confidence in the risk estimate is medium.*

#### **Maskants for Chemical Milling**

Releases from five maskants for chemical milling facilities were modeled for the risk estimate. The model used direct and indirect releases to surface water including still water bodies. None of the facility releases show a surface water concentration that resulted in an RQs  $\geq 1$  or any days of exceedance.

*No risks were identified for aquatic organisms with this COU. Based on the data quality, uncertainties and weight of scientific evidence, confidence in the risk estimate is medium.*

#### **Industrial Processing Aid**

Of the 12 industrial processing aid facilities, six facilities had RQs  $\geq 1$  and 20 days or more of exceedance for algae.

- Chevron Products Co Richmond Refinery, Richmond, CA: Using the scenario of 20 days of direct release to surface water resulted in a surface water concentration of 2.7 ppb, algae had an RQ = 1.9 and 20 days of exceedance.
- ExxonMobil Oil Beaumont Refinery Beaumont, TX: Using the scenario of 300 days of direct release to surface water resulted in a surface water concentration of 5.5 ppb, algae had an RQ = 4.0 and 55 days of exceedance. Using the scenario of 20 days of direct release to surface water resulted in a surface water concentration of 97 ppb, algae had an RQ = 69 and 20 days of exceedance.
- Marathon Petroleum Co LP, Garyville, LA: Using the scenario of 20 days of direct release to still surface water resulted in a surface water concentration of 6.6 ppb, algae had an RQ = 4.7 and 20 days of exceedance.
- Occidental Chemical Corp Niagara Plant, Niagara Falls, NY: Using the scenario of 300 days of indirect release (80% removal) to surface water resulted in a surface water concentration of 6.3 ppb, algae had an RQ = 4.5 and 92 days of exceedance. Using the scenario of 20 days of direct release to still surface water resulted in a surface water concentration of 20 ppb, algae had an RQ = 14 and 20 days of exceedance.
- Tesoro Los Angeles Refinery-Carson Operations, Carson, CA: Using the scenario of 300 days of direct release to surface water resulted in a surface water concentration of 12 ppb, algae had an RQ = 8.5 and 169 days of exceedance.

- Valero Refining Co -Oklahoma Valero Ardmore Refinery, Ardmore, OK: Using a surrogate organic chemicals manufacturer, with 300 days of direct release to surface water resulted in a surface water concentration of 1.9 ppb, algae had an RQ = 1.3 and 42 days of exceedance.

*EPA identified risk to algae from direct and indirect releases of PCE to surface water from the Industrial Processing Aid COU at six facilities. Based on the data quality, uncertainties and weight of scientific evidence, confidence in the risk estimate is medium.*

#### **Other Industrial Uses**

Releases from seven with other industrial use facilities were modeled for the risk estimate. The model used direct releases to surface water. None of the facility releases show a surface water concentration that resulted in an RQs  $\geq 1$  or RQs  $\geq 1$  and 20 days of exceedance for chronic or algal risk.

*No risks were identified for aquatic organisms with this COU. Based on the data quality, uncertainties and weight of scientific evidence, confidence in the risk estimate is medium.*

#### **Other Commercial Uses**

Releases from seven other commercial use facilities were modeled for the risk estimate. The model used direct releases to surface water. None of the facility releases show a surface water concentration that resulted in an RQs  $\geq 1$  or RQs  $\geq 1$  and 20 days of exceedance for chronic or algal risk.

*No risks were identified for aquatic organisms with this COU. Based on the data quality, uncertainties and weight of scientific evidence, confidence in the risk estimate is medium.*

#### **Waste Handling, Disposal, Treatment, and Recycling**

Of the 13 facilities engaged in waste handling, disposal, treatment, and recycling of PCE, three facilities had RQs  $\geq 1$  and 20 days of exceedance for algae.

- Clean Harbors Deer Park LLC, La Porte, TX: Using the scenario of 250 days of indirect release (80% removal) to surface water resulted in a surface water concentration of 9.0 ppb, algae had an RQ = 6.4 and 172 days of exceedance. Using the scenario of 20 days of indirect release (80% removal) to surface water resulted in a surface water concentration of 113 ppb, algae had an RQ = 80 and 20 days of exceedance.
- Safety-Kleen Systems Inc, Smithfield, KY: Using the scenario of 250 days of indirect release (80% removal) to surface water resulted in a surface water concentration of 35 ppb, algae had an RQ = 25 and 235 days of exceedance. Using the scenario of 20 days of indirect release (80% removal) to surface water resulted in a surface water concentration of 436 ppb, algae had an RQ = 311 and 20 days of exceedance.
- Tier Environmental LLC, Bedford, OH: Using the scenario of 250 days of indirect release (80% removal) to surface water resulted in a surface water concentration of 3.1 ppb, algae had an RQ = 2.2 and 90 days of exceedance.

*EPA identified risk to algae with 80% PCE removal from waste water treatment at three facilities. Indicating that with the Waste Handling, Disposal, Treatment, and Recycling COU, risk to algae can exist even with waste water treatment if the rate of PCE release to surface water is high. Based on the data quality, uncertainties and weight of scientific evidence, confidence in the risk estimate is medium.*

#### 4.1.3 Risk Estimation for Sediment Pathways

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EPA did not quantitatively analyze exposure to sediment organisms. PCE is expected to be moderately retained in sediment due to its water solubility (206 mg/L) and moderate partitioning to organic matter (log KOC = 2.95). Because PCE has moderate partitioning to organic matter, in sediments PCE is expected to be both adsorbed to the sediment organic matter and present in the pore water. However, depending on the microbial consortia present and their previous exposure and adaptation to PCE, PCE may undergo rapid biodegradation in sediment. Thus, PCE concentrations in sediment may be lower or somewhat greater than concentrations in overlying water. While no ecotoxicity studies were available for sediment-dwelling organisms (e.g., *Lumbriculus variegatus*, *Hyaella azteca*, *Chironomus riparius*), the toxicity of PCE to sediment invertebrates is expected to be similar to the toxicity to aquatic invertebrates because of the similarities in PCE concentrations. EPA calculated an acute aquatic invertebrate COC of 1,342 ppb, and a chronic aquatic invertebrate COC of 50 ppb to assess hazards to sediment organisms.

#### 4.1.4 Risk Estimation for Land-Applied Biosolids Pathway

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EPA did not analyze PCE for other releases to land during risk evaluation, including biosolids application to soil as indicated in the Problem Formulation.

EPA did not assess exposure to terrestrial organisms through soil, land-applied biosolids, or ambient air. PCE has moderate potential to partition to or accumulate in soil, but is primarily expected to volatilize to air or migrate through soil into groundwater based on its physical-chemical properties (log K<sub>OC</sub> = 3, Henry's Law constant = 0.018 atm-m<sup>3</sup>/mole, vapor pressure = 19 mmHg at 20°C). Therefore, physical-chemical properties do not support an exposure pathway through water and soil pathways to terrestrial organisms.

## 4.2 Human Health Risk

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PCE exposure is associated with a variety of cancer and non-cancer adverse effects deemed relevant to humans for risk estimations for the scenarios and populations addressed in this risk evaluation. Based on a weight-of-evidence analysis of the available toxicity studies from animals and humans, the non-cancer effects selected for risk estimation because of their robustness and sensitivity were neurotoxicity (i.e. increased latencies for pattern reversal visual-evoked potentials) from acute exposure, developmental toxicity from repeated exposures (i.e. longer than acute, single day exposures and shorter than chronic, many year exposures) and multiple effects including CNS, kidney, liver and immune system toxicity from chronic exposures. The evaluation of cancer includes estimates of risk of lung and liver tumors.

#### 4.2.1 Risk Estimation Approach

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Equation 4-1 was used to calculate non-cancer risks using margins of exposure for acute or chronic exposure durations.

#### Equation 4-1 Equation to Calculate Non-Cancer Risks Following Acute or Chronic Exposures Using Margin of Exposures

$$MOE_{acute\ or\ chronic} = \frac{Non - cancer\ Hazard\ value\ (POD)}{Human\ Exposure}$$

Where:

MOE = Margin of exposure (unitless)

Hazard value (POD) = HEC (ppm)

Human Exposure = Exposure estimate (in ppm) from occupational or consumer exposure

8656 assessment. ADCs were used for non-cancer chronic risks and acute  
8657 concentrations were used for acute risks (see Section 3.2.5)

8658 EPA/OPPT used margin of exposures (MOEs)<sup>18</sup> to estimate acute or chronic risks for non-cancer based  
8659 on the following:

- 8660 1. the lowest HECs within each health effects domain reported in the literature;
- 8661 2. the endpoint/study-specific UFs applied to the HECs per the EPA Guidance (U.S. EPA, 2002);  
8662 and
- 8663 3. the exposure estimates calculated for PCE uses examined in this risk assessment (see Section 2  
8664 Exposures).

8665  
8666 MOEs allow for the presentation of a range of risk estimates. The occupational exposure scenarios  
8667 considered both acute and chronic exposures. All consumer uses considered only acute exposure  
8668 scenarios. Different adverse endpoints were used based on the expected exposure durations. For non-  
8669 cancer effects, risks for neurotoxicity (i.e. increased latencies for pattern reversal visual-evoked  
8670 potentials) from acute exposure were evaluated.

8671  
8672 For occupational exposure calculations, the 8 hr or 12 hr TWA was used to calculate inhalation MOEs  
8673 for risk estimates for acute exposures and the chronic average daily concentration (ADC) was used for  
8674 chronic exposures. For dermal estimates, acute and chronic retained doses were used. The total UF for  
8675 each non-cancer POD was the benchmark MOE used to interpret the MOE risk estimates for each use  
8676 scenario. The MOE estimate was interpreted as human health risk if the MOE estimate was less than  
8677 the benchmark MOE (i.e. the total UF). On the other hand, the MOE estimate indicated negligible  
8678 concerns for adverse human health effects if the MOE estimate exceeded the benchmark MOE.  
8679 Typically, the larger the MOE, the more unlikely it is that a non-cancer adverse effect would occur.  
8680 Risk estimates were calculated for all of the studies per health effects domain that EPA/OPPT  
8681 considered suitable for the risk evaluation of acute and chronic exposure scenarios in the work plan risk  
8682 assessment for PCE.

8683  
8684 The PBPK model (Section 3.2.2.2) allowed it to be used to calculate internal dose metrics for inhaled  
8685 and oral exposure to PCE for mice, rats, and humans and therefore was used for route-to-route  
8686 extrapolation between oral and inhalation routes. Dermal candidate values were calculated based on  
8687 route-to-route extrapolation from two different routes either inhalation or oral PODs. The PODs were  
8688 extrapolated from POD values based on either human data or human equivalent values (e.g. BMDL<sub>HEC</sub>)  
8689 which have already been adjusted to account for animal to human extrapolation using the best available  
8690 approaches for incorporating PCE specific toxicokinetic data (i.e. the PBPK model) when possible.  
8691 When dermal HEDs were derived by both methods, the most sensitive resulting HED was selected for  
8692 use in risk estimation in order to be health-protective.

8693  
8694 Added cancer risks for repeated exposures to PCE were estimated using Equation 4-2. Estimates of  
8695 added cancer risks should be interpreted as the incremental probability of an individual developing  
8696 cancer over a lifetime as a result of exposure to the potential carcinogen (i.e., incremental or added  
8697 individual lifetime cancer risk).

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<sup>18</sup> Margin of Exposure (MOE) = (Non-cancer hazard value, POD) ÷ (Human Exposure). Equation 4-1. The benchmark MOE is used to interpret the MOEs and consists of the total UF shown in Table 3-5.

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**Equation 4-2 Equation to Calculate Added Cancer Risks**

$$Risk = Human\ Exposure \times IUR$$

Where:

- Risk = Added cancer risk (unitless)
- Human exposure = Exposure estimate (LADC in mg/m<sup>3</sup>) from occupational exposure assessment
- IUR = Inhalation unit risk (2 x 10<sup>-3</sup> per mg/m<sup>3</sup>)

**4.2.2 Risk Estimation for Inhalation Exposures to Workers**

**4.2.2.1 PODs used for Occupational Inhalation Risk Estimates**

The risk assessment used the inhalation exposure estimates in Section 2.4.1 and the hazard PODs summarized in Table 3-7, Table 3-8, and Table 3-9. For acute exposure scenarios, PODs for 8 and 12hr exposure durations were used because those durations are most applicable to occupational exposure scenarios. From among all chronic studies, EPA selected the most robust studies and non-cancer PODs from within each health domain to serve as representative endpoints for risk estimation (Section 3.2.5.4). These representative PODs are presented below in Table 4-2 along with the acute POD. Non-cancer risk estimates were calculated with equation 4-1 and cancer risks were calculated with equation 4-2. Risk is indicated for each OES or COU by bold text and a shaded cell in the table.

**Table 4-2. Selected Non-cancer PODs for Use in Risk Estimation of Inhalation Exposures**

Target Organ System	Species	Human Equivalent Concentration (HEC)	Effect	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality Score
<b>ACUTE EXPOSURE</b>						
CNS	Humans	8 hrs/day = 5 ppm (34 mg/m <sup>3</sup> )	Neurotoxicity increased latencies for pattern reversal visual-evoked potentials	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=10</b>	Altmann et al. (1990)	Medium
		12 hrs/day = 3.3 ppm (22 mg/m <sup>3</sup> )				
<b>CHRONIC EXPOSURE</b>						
CNS	Humans	5.2 ppm (36 mg/m <sup>3</sup> )	Midpoint of the range of the two neurotoxicity studies	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 <b>Total UF=100</b>	Based on U.S. EPA (2012c)	Medium
Kidney	Mice	2.1 ppm (14 mg/m <sup>3</sup> )	Nuclear enlargement in proximal tubules	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	JISA (1993)	High
Liver	Mice	31 ppm (210 mg/m <sup>3</sup> )	Increased angiectasis in liver	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	JISA (1993)	High
Reproductive/ Developmental	<i>Reproductive</i>					
	Mice	21 ppm (140 mg/m <sup>3</sup> )	Reduced sperm quality following 5 days exposure	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	Beliles et al. (1980)	High

Target Organ System	Species	Human Equivalent Concentration (HEC)	Effect	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality Score
<i>Developmental</i>						
	Rats	18 ppm (122 mg/m <sup>3</sup> )	Increased F <sub>2A</sub> pup deaths by Day 29, CNS depression in F <sub>1</sub> and F <sub>2</sub>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	Tinston et al. (1994)	High
<b>CANCER</b>						
Liver	Mouse	IUR 2 × 10 <sup>-3</sup> per ppm (3 × 10 <sup>-4</sup> per mg/m <sup>3</sup> )	Hepatocellular tumors (males)	N/A	JISA (1993)	High

8720

8721 EPA also provided chronic inhalation risk estimates as a sensitivity analysis based on 8 hr and 12 hr  
8722 occupational neurotoxicity HECs (14.5 ppm and 9.7 ppm, respectively, see Table 3-8) compared to 8 hr  
8723 or 12 hr TWA exposures. These risk estimates are approximately 36% lower than the risk estimates  
8724 using the chronic HECs based on continuous 24 hr exposure. See Appendix G for risk estimates for all  
8725 OES.

8726 **4.2.2.2 Occupational Inhalation Exposure Summary and PPE Use Determination by**  
8727 **OES**

8728 EPA considered all reasonably available data for estimating exposures for each OES. EPA also  
8729 determined whether respirator use up to APF = 50 was plausible for those OES based on expert  
8730 judgement and reasonably available information. Table 4-3 presents this information below, which is  
8731 considered in the risk characterization for each OES in the following sections.  
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8733

**Table 4-3. Inhalation Exposure Data Summary and Respirator Use Determination**

Occupational Exposure Scenario	Inhalation Exposure Approach	Number of Data Points	Model Used	Approach for ONUs	Respirator Use	Industrial or Commercial OES
Manufacturing	Monitoring data	152 (75 8-hr TWA and 77 12-hr TWA)	N/A – monitoring data only	Equal to workers (assumes employees may be workers or ONUs throughout their shift)	May use respirators	Industrial
Repackaging	Monitoring data	10	N/A – monitoring data only	Not assessed	May use respirators	Industrial
Processing as a Reactant	Surrogate monitoring data from manufacturing	152 (75 8-hr TWA and 77 12-hr TWA)	N/A – monitoring data only	Equal to workers (assumes employees may be workers or ONUs throughout their shift)	May use respirators	Industrial
Incorporation into Formulation – Aerosol Packing	Monitoring data	5	N/A – monitoring data only	Not assessed	May use respirators	Industrial

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<b>Occupational Exposure Scenario</b>	<b>Inhalation Exposure Approach</b>	<b>Number of Data Points</b>	<b>Model Used</b>	<b>Approach for ONUs</b>	<b>Respirator Use</b>	<b>Industrial or Commercial OES</b>
Incorporation into Formulation – Non-Aerosol Formulations	Modeling	N/A – model only	EPA/OAQPS AP-42 Loading Model & EPA/OPPT Mass Balance Model	Not assessed	May use respirators	Industrial
Open-Top Vapor Degreasing	Monitoring data	75 (63 worker and 12 ONUs)	N/A – monitoring data only	ONU monitoring data available	May use respirators	Industrial/ Commercial
Closed-Loop Vapor Degreasing	Monitoring data	15 (13 worker and 2 ONU)	N/A – monitoring data only	ONU monitoring data available	May use respirators	Industrial/ Commercial
Conveyorized Vapor Degreasing	Model	N/A – model only	Conveyorized Degreasing Near-Field/Far-Field Inhalation Exposure Model	Far-field model results	May use respirators	Industrial/ Commercial
Web Degreasing	Model	N/A – model only	Web Degreasing Near-Field/Far-Field Inhalation Exposure Model	Far-field model results	May use respirators	Industrial/ Commercial
Cold Cleaning	Monitoring data supplemented by model	29	Cold Cleaning Near-Field/Far-Field Inhalation Exposure Model	Far-field model results	May use respirators	Industrial/ Commercial
Aerosol Degreasing and Aerosol Lubricants	Monitoring data supplemented by model	130	Brake Servicing Near-Field/Far-Field Inhalation Exposure Model	Far-field model results	No respirator use – commercial use	Commercial
Dry Cleaning	Monitoring data supplemented by model	140 (135 workers and 5 ONUs)	Dry Cleaning Multi-Zone Inhalation Exposure Model	ONU monitoring data available supplemented by far-field model results	No respirator use – commercial use	Commercial
Paint and Coatings	Monitoring data	15	N/A – monitoring data only	Not assessed	May use respirators	Industrial/ Commercial
Adhesives	Monitoring data	13	N/A – monitoring data only	Not assessed	May use respirators	Industrial/ Commercial
Chemical Maskant	Monitoring data	24	N/A – monitoring data only	Not assessed	May use respirators	Industrial
Industrial Processing Aid	Monitoring data	89	N/A – monitoring data only	Not assessed	May use respirators	Industrial

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Occupational Exposure Scenario	Inhalation Exposure Approach	Number of Data Points	Model Used	Approach for ONUs	Respirator Use	Industrial or Commercial OES
Other Industrial Uses	Model	N/A – model only	Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model	Not assessed	May use respirators	Industrial
Metalworking Fluid	Emission scenario document	N/A – emission scenario document	Estimates from Use of Metalworking Fluids ESD	Not assessed	No respirator use – ESD indicates respirators are not generally used	Industrial/ Commercial
Wipe Cleaning	Monitoring data	10 (4 workers and 6 ONUs)	N/A – monitoring data only	ONU monitoring data available	No respirator use – commercial use	Commercial
Other Spot Cleaning/Spot Removers (including Carpet Cleaning)	Monitoring data	3 (2 workers and 1 ONU)	N/A – monitoring data only	ONU monitoring data available	No respirator use – commercial use	Commercial
Other Commercial Uses	Monitoring data	92	N/A – monitoring data only	Not assessed	No respirator use – commercial use	Commercial
Other DoD Uses	Monitoring data	2	N/A – monitoring data only	Not assessed	May use respirators	Industrial/ Commercial
Disposal/Recycling	Model	N/A – model only	Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model	Not assessed	May use respirators	Industrial

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4.2.2.3 Manufacturing

For manufacturing, exposure estimates for TWAs of 15 mins, 30 mins, 8 hrs, and 12 hrs are available based on personal monitoring data samples, including 351 data points from one source. EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. Data were not available to estimate ONU exposures; EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not typically directly handle the chemical. In lieu of data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is high for workers and low for ONUs. Section 2.4.1.6 describes the justification for this occupational scenario confidence rating.

**Table 4-4. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Manufacturing**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	1.9	154	19	48	96	10
		Central Tendency	154		1,538	3,846	7,692	
12-hr	3.3	High-End	16	161	156	389	778	10
		Central Tendency	161		1,610	4,024	8,049	

<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-5. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Manufacturing**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Based on exposure data for 8 hr TWA								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	8.7	701	87	218	436	100
		Central Tendency	701		7,008	17,520	35,040	
Kidney - Histopathology (JISA 1993)	2.1	High-End	3.5	283	35	88	176	30
		Central Tendency	283		2,830	7,075	14,151	
Liver - Vessel dilation (JISA 1993)	31	High-End	52	4,178	520	1,300	2,599	30
		Central Tendency	4,178		41,778	104,446	208,892	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	35	2,830	352	880	1,761	30
		Central Tendency	2,830		28,302	70,754	141,508	

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	30	2,426	302	755	1,509	30
		Central Tendency	2,426		24,258	60,646	121,292	
Based on exposure data for 12 hr TWA								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	72	741	716	1,791	3,581	100
		Central Tendency	741		7,407	18,517	37,034	
Kidney - Histopathology (JISA 1993)	2.1	High-End	29	299	289	723	1,446	30
		Central Tendency	299		2,991	7,478	14,956	
Liver - Vessel dilation (JISA 1993)	31	High-End	427	4,416	4,270	10,675	21,349	30
		Central Tendency	4,416		44,156	110,390	220,780	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	289	2,991	2,892	7,231	14,462	30
		Central Tendency	2,991		29,912	74,780	149,561	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	30	2,426	302	755	1,509	30
		Central Tendency	2,426		24,258	60,646	121,292	

<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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**Table 4-6. Risk Estimation for Chronic, Cancer Inhalation Exposures for Manufacturing**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Based on exposure data for 8 hr TWA								
Cancer Risk liver tumors	2.0E-3	High-End	6.1E-4	5.9E-6	6.1E-5	2.4E-5	1.2E-5	10 <sup>-4</sup>
		Central Tendency	5.9E-6		5.9E-7	2.4E-7	1.2E-7	
Based on exposure data for 12 hr TWA								
Cancer Risk liver tumors	2.0E-3	High-End	7.5E-5	5.6E-6	7.5E-6	3.0E-6	1.5E-6	10 <sup>-4</sup>
		Central Tendency	5.6E-6		5.6E-7	2.2E-7	1.1E-7	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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4.2.2.4 Repackaging

For repackaging, exposure estimates for TWAs of 15 mins, 30 mins, and 8 hrs are available based on personal monitoring data samples, including 17 data points from 1 source. EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively, for the 8-hr TWAs. Due to the limited number of data points, EPA used the median and maximum to characterize the central tendency and high-end exposure estimates, respectively, for the 15- and 30-min TWAs. EPA has not identified reasonably available data on potential ONU inhalation exposures from PCE repackaging. ONU inhalation exposures are expected to be lower than worker inhalation exposures however the relative exposure of ONUs to workers cannot be quantified as described in more detail above in Section 2.4.1.7. In lieu of data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium for workers and low for ONUs. Section 2.4.1.7 describes the justification for this occupational scenario confidence rating.

**Table 4-7. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Import/Repackaging**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High- End	6.1	11	61	153	305	10
		Central Tendency	11		115	287	574	

<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-8. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Import/Repackaging**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
CNS - Visual effects (U.S. EPA 2012c)	5.2	High- End	28	52	278	695	1,390	100
		Central Tendency	52		523	1,308	2,617	
Kidney - Histopathology (JISA 1993)	2.1	High- End	11	21	112	281	561	30
		Central Tendency	21		211	528	1,057	
Liver - Vessel dilation (JISA 1993)	31	High- End	166	312	1,657	4,413	8,287	30
		Central Tendency	312		3,120	7,799	15,599	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High- End	112	211	1,123	2,807	5,614	30
		Central Tendency	211		2,113	5,283	10,567	
Developmental -	18	High-	96	181	962	2,406	4,812	30

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Mortality/ CNS effects (Tinston 1994)		End						
		Central Tendency	181		1,811	4,529	9,057	

<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-9. Risk Estimation for Chronic, Cancer Inhalation Exposures for Import/Repackaging**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Cancer Risk liver tumors	2.0E-3	High-End	1.9E-4	7.9E-5	1.9E-5	7.7E-6	3.8E-6	10 <sup>-4</sup>
		Central Tendency	7.9E-5		7.9E-6	3.2E-6	1.6E-6	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

#### 4.2.2.5 Processing as Reactant

For processing as a reactant, exposure estimates for TWAs of 15 mins, 30 mins, and 8 hrs are available based on surrogate personal monitoring data samples, including 351 data points from one source. EPA uses surrogate data for PCE manufacturing to approximate exposures during processing as a reactant as monitoring data specific to this condition of use were not available and manufacturing sites and sites processing PCE as a reactant are expected to have similar operations. EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. Data were not available to estimate ONU exposures; EPA estimates that ONU exposures are lower than worker exposures, since ONUs do not typically directly handle the chemical. In lieu of data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium to high for workers and low for ONUs. Section 2.4.1.8 describes the justification for this occupational scenario confidence rating.

**Table 4-10. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Processing as Reactant**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	1.9	154	19	48	96	10
		Central Tendency	154		1,538	3,846	7,692	
12-hr	3.3	High-End	16	161	156	389	778	10

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
		Central Tendency	161		1,610	4,024	8,049	

<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-11. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Processing as Reactant**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Based on exposure data for 8 hr TWA								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High- End	<b>8.7</b>	701	<b>87</b>	218	436	100
		Central Tendency	701		7,008	17,520	35,040	
Kidney - Histopathology (JISA 1993)	2.1	High- End	<b>3.5</b>	283	<b>35</b>	88	176	30
		Central Tendency	283		2,830	7,075	14,151	
Liver - Vessel dilation (JISA 1993)	31	High- End	52	4,178	520	1,300	2,599	30
		Central Tendency	4,178		41,778	104,446	208,892	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High- End	35	2,830	352	880	1761	30
		Central Tendency	2,830		28,302	70,754	141,508	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High- End	30	2,426	302	755	1,509	30
		Central Tendency	2,426		24,258	60,646	121,292	
Based on exposure data for 12 hr TWA								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High- End	<b>72</b>	741	716	1,791	3,581	100
		Central Tendency	741		7,407	18,517	37,034	
Kidney - Histopathology (JISA 1993)	2.1	High- End	<b>29</b>	299	289	723	1,446	30
		Central Tendency	299		2,991	7,478	14,956	
Liver - Vessel dilation (JISA 1993)	31	High- End	427	4,416	4,270	10,675	21,349	30
		Central Tendency	4,416		44,156	110,390	220,780	
Reproductive - Sperm effects	21	High- End	289	2,991	2,892	7,231	14,462	30

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Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)	
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25		Worker APF 50
(Beliles et al. 1980)		Central Tendency	2,991		29,912	74,780	149,561	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	248	2,564	2,479	6,198	12,396	30
		Central Tendency	2,564		25,639	64,098	128,195	

<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-12. Risk Estimation for Chronic, Cancer Inhalation Exposures for Processing as Reactant**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates				Benchmark	
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25		Worker APF 50
Based on exposure data for 8 hr TWA								
Cancer Risk liver tumors	2.0E-3	High-End	6.1E-4	5.9E-6	6.1E-5	2.4E-5	1.2E-5	10 <sup>-4</sup>
		Central Tendency	5.9E-6		5.9E-7	2.4E-7	1.2E-7	
Based on exposure data for 12 hr TWA								
Cancer Risk liver tumors	2.0E-3	High-End	7.5E-5	5.6E-6	7.5E-6	3.0E-6	1.5E-6	10 <sup>-4</sup>
		Central Tendency	5.6E-6		5.6E-7	2.2E-7	1.1E-7	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

#### 4.2.2.6 Incorporation into Formulation, Mixture, or Reactant Product

For incorporation into formulation, mixture, or reaction product, exposure estimates for TWAs of 8 hrs are available based on personal monitoring data samples for aerosol packing, including 5 data points from one source, and modeling for degreasing solvent, dry cleaning solvent, and miscellaneous product formulations. For aerosol packing, EPA calculated the median and maximum to characterize the central tendency and high-end exposure estimates, respectively. For the other formulation types, EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. EPA has not identified reasonably available data to estimate potential ONU inhalation exposures from PCE incorporation into formulation, mixture, or reaction product using monitoring data or modeling. ONU inhalation exposures are expected to be lower than worker inhalation exposures however the relative exposure of ONUs to workers cannot be quantified as described in more detail above in Section 2.4.1.9. In lieu of data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall confidence in the aerosol packing inhalation estimates in this scenario is high for workers and low for ONUs and EPA's overall confidence in the modeled exposures for other formulation types is medium for workers and low for ONUs. Section 2.4.1.9 describes the justification for this occupational scenario confidence rating.

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**Table 4-13. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Incorporation into Formulation, Mixture, or Reactant Product**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Aerosol Packing								
8-hr	5.0	High-End	0.4	0.6	3.8	9.5	19	10
		Central Tendency	0.6		6.0	15	30	
Degreasing Solvent								
8-hr	5.0	High-End	1.9	6.9	19	48	96	10
		Central Tendency	6.9		69	171	343	
Dry Cleaning Solvent								
8-hr	5.0	High-End	0.4	1.3	3.5	8.9	18	10
		Central Tendency	1.3		13	32	63	
Miscellaneous								
8-hr	5.0	High-End	3.5	13	35	89	177	10
		Central Tendency	13		126	315	629	

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<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-14. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Incorporation into Formulation, Mixture, or Reactant Product**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Aerosol Packing								
CNS - Visual Effects	5.2	High-End	1.7	2.7	17	43	87	100
		Central Tendency	2.7		27	69	137	
Kidney - Histopathology	2.1	High-End	0.7	1.1	7.0	18	35	30
		Central Tendency	1.1		11	28	55	
Liver - Vessel dilation	31	High-End	10	16	103	258	517	30
		Central Tendency	16		164	410	819	
Reproductive - Sperm Effects	21	High-End	7.0	11	70	175	350	30
		Central Tendency	11		111	277	555	
Developmental - Mortality/CNS	18	High-End	6.0	9.5	60	150	300	30
		Central Tendency	9.5		95	237	475	

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Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Degreasing Solvent								
CNS - Visual Effects	5.2	High-End	92	328	918	2,296	4,591	100
		Central Tendency	328		3,277	8,194	16,387	
Kidney - Histopathology	2.1	High-End	37	132	371	927	1,854	30
		Central Tendency	132		1,324	3,309	6,618	
Liver - Vessel dilation	31	High-End	547	1,954	5,474	13,685	27,371	30
		Central Tendency	1,954		19,539	48,846	97,693	
Reproductive - Sperm Effects	21	High-End	371	1,324	3,708	9,271	18,542	30
		Central Tendency	1,324		13,236	33,089	66,179	
Developmental - Mortality/CNS	18	High-End	318	1,134	3,179	7,946	15,893	30
		Central Tendency	1,134		11,345	28,362	56,725	
Dry Cleaning Solvent								
CNS - Visual Effects	5.2	High-End	17	60	169	423	847	100
		Central Tendency	60		604	1,509	3,018	
Kidney - Histopathology	2.1	High-End	6.8	24	68	171	342	30
		Central Tendency	24		244	609	1,219	
Liver - Vessel dilation	31	High-End	101	360	1,009	2,523	5,047	30
		Central Tendency	360		3,599	8,996	17,993	
Reproductive - Sperm Effects	21	High-End	68	244	684	1,709	3,419	30
		Central Tendency	244		2,438	6,094	12,189	
Developmental - Mortality/CNS	18	High-End	59	209	586	1,465	2,930	30
		Central Tendency	209		2,089	5,224	10,447	
Miscellaneous								
CNS - Visual Effects	5.2	High-End	169	602	1,693	4,231	8,463	100
		Central Tendency	602		6,016	15,041	30,082	
Kidney - Histopathology	2.1	High-End	68	243	684	1,709	3,418	30
		Central Tendency	243		2,430	6,074	12,149	
Liver - Vessel dilation	31	High-End	1,009	3,587	10,090	25,226	50,451	30
		Central Tendency	3,587		35,868	89,669	179,338	
Reproductive - Sperm Effects	21	High-End	684	2,430	6,835	17,088	34,177	30
		Central Tendency	2,430		24,297	60,744	121,487	
	18	High-End	586	2,083	5,859	14,647	29,294	30



Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Developmental - Mortality/CNS		Central Tendency	2,083		20,826	52,066	104,132	

<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-15. Risk Estimation for Chronic, Cancer Inhalation Exposures for Incorporation into Formulation, Mixture, or Reactant Product**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Aerosol Packing								
Cancer Risk liver tumors	2.0E-3	High-End	3.1E-3	1.5E-3	3.1E-4	1.2E-4	6.2E-5	10 <sup>-4</sup>
		Central Tendency	1.5E-3		1.5E-4	6.0E-5	3.0E-5	
Degreasing Solvent								
Cancer Risk liver tumors	2.0E-3	High-End	1.7E-5	4.7E-6	1.7E-6	6.7E-7	3.3E-7	10 <sup>-4</sup>
		Central Tendency	4.7E-6		4.7E-7	1.9E-7	9.4E-8	
Dry Cleaning Solvent								
Cancer Risk liver tumors	2.0E-3	High-End	9.1E-5	2.5E-5	9.1E-6	3.6E-6	1.8E-6	10 <sup>-4</sup>
		Central Tendency	2.5E-5		2.5E-6	1.0E-6	5.1E-7	
Miscellaneous								
Cancer Risk liver tumors	2.0E-3	High-End	9.1E-6	2.6E-6	9.1E-7	3.6E-7	1.8E-7	10 <sup>-4</sup>
		Central Tendency	2.6E-6		2.6E-7	1.0E-7	5.1E-8	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

#### 4.2.2.7 Batch Open-Top Vapor Degreasing

For OTVDs, exposure estimates for TWAs of 15 mins, 4 hrs, and 8 hrs are available based on personal monitoring data samples, including 79 data points from multiple sources. For 8-hr TWAs, EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. Due to the limited number of data points, EPA used the median and maximum to characterize the central tendency and high-end exposure estimates, respectively, for the 4-hr TWA. For the 15-min TWA, exposures are based on the single data point that was available. EPA identified 12 of the 79 data points to be for ONU exposures at sites operating OTVDs as described in more detail above

8859 in Section 2.4.1.10. Considering the overall strengths and limitations of the data, EPA's overall  
 8860 confidence in the occupational inhalation estimates in this scenario is medium to high. Section 2.4.1.10  
 8861 describes the justification for this occupational scenario confidence rating.  
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8863 **Table 4-16. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Batch Open-Top**  
 8864 **Vapor Degreasing**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	0.2	1.0	1.6	3.9	7.8	10
		Central Tendency	2.4	8.2	24	60	119	

8865 <sup>1</sup> Data from Altmann et al. (1990)  
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8867 **Table 4-17. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Batch Open-Top**  
 8868 **Vapor Degreasing**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	5.2	High- End	0.7	4.4	7.1	18	35	100
		Central Tendency	11	38	108	271	542	
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.1	High- End	0.3	1.8	2.9	7.2	14	30
		Central Tendency	4.4	15	44	110	219	
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	31	High- End	4.2	26	42	106	212	30
		Central Tendency	65	224	647	1,616	3,233	
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	21	High- End	2.9	18	29	72	143	30
		Central Tendency	44	152	438	1,095	2,190	
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	21	High- End	2.5	15	25	61	123	30
		Central Tendency	38	130	375	939	1,877	

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8870 **Table 4-18. Risk Estimation for Chronic, Cancer Inhalation Exposures for Batch Open-Top**  
 8871 **Vapor Degreasing**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
Cancer Risk liver tumors	2.0E-3	High-End	7.5E-3	1.2E-3	7.5E-4	3.0E-4	1.5E-4	10 <sup>-4</sup>
		Central Tendency	3.8E-4	1.1E-4	3.8E-5	1.5E-5	7.6E-6	

<sup>1</sup> Data from JISA (1993)

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8874 **4.2.2.8 Batch Closed-Loop Vapor Degreasing**

8875 For batch closed-loop vapor degreasing, exposure estimates for TWAs of 4 hrs and 8 hrs are available  
 8876 based on personal monitoring data samples, including 18 data points from two sources. For worker 8-hr  
 8877 TWAs, EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end  
 8878 exposure estimates. Due to the limited number of data points, for 4-hr TWAs and ONU 8-hr TWAs,  
 8879 EPA calculated the median and maximum to characterize the central tendency and high-end exposure  
 8880 estimates. EPA identified 2 of the 18 data points to be for ONU exposures at sites operating batch  
 8881 closed-loop vapor degreasers as described in more detail above in Section 2.4.1.11. Considering the  
 8882 overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation  
 8883 estimates in this scenario is high. Section 2.4.1.11 describes the justification for this occupational  
 8884 scenario confidence rating.  
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8886 **Table 4-19. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Batch Closed-Loop**  
 8887 **Vapor Degreasing**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	20	52	198	494	988	10
		Central Tendency	69	76	693	1,732	3,463	

<sup>1</sup> Data from Altmann et al. (1990)

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8890 **Table 4-20. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Batch Closed-**  
 8891 **Loop Vapor Degreasing**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	90	238	900	2,250	4,501	100
		Central Tendency	316	348	3,155	7,888	15,776	
Kidney - Histopathology (JISA 1993)	2.1	High-End	36	96	364	909	1,818	30
		Central Tendency	127	141	1,274	3,185	6,371	
Liver -	31	High-	537	1,418	5,366	13,416	26,832	30

Vessel dilation (JISA 1993)		End						
		Central Tendency	1,881	2,075	18,809	47,023	94,047	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	364	961	3,635	9,088	18,176	30
		Central Tendency	1,274	1,406	12,742	31,855	63,709	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	312	823	3,116	7,790	15,580	30
		Central Tendency	1,092	1,205	10,922	27,304	54,608	

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**Table 4-21. Risk Estimation for Chronic, Cancer Inhalation Exposures for Batch Closed-Loop Vapor Degreasing**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
Cancer Risk	2.0E-3	High-End	5.9E-5	2.2E-5	5.9E-6	2.4E-6	1.2E-6	10 <sup>-4</sup>
		Central Tendency	1.3E-5	1.2E-5	1.3E-6	5.2E-7	2.6E-7	

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<sup>1</sup> Data from JISA (1993)

#### 4.2.2.9 ConveyORIZED Vapor Degreasing

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For conveyORIZED vapor degreasing, exposure estimates for TWAs of 8 hrs are available based on modeling with a near-field and far-field approach. EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. EPA used the near-field air concentrations for worker exposures and the far-field air concentrations for potential ONU inhalation exposures from PCE conveyORIZED vapor degreasing as described in more detail above in Section 2.4.1.12. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium. Section 2.4.1.12 describes the justification for this occupational scenario confidence rating.

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**Table 4-22. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for ConveyORIZED Vapor Degreasing**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	2.7E-2	4.0E-2	0.3	0.7	1.3	10
		Central Tendency	6.4E-2	0.1	0.6	1.6	3.2	

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<sup>1</sup> Data from Altmann et al. (1990)

8911 **Table 4-23. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for ConveyORIZED**  
 8912 **Vapor Degreasing**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	5.2	High-End	0.1	0.2	1.2	3.1	6.1	100
		Central Tendency	0.3	0.6	2.9	7.3	15	
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.1	High-End	4.9E-2	7.3E-2	0.5	1.2	2.5	30
		Central Tendency	0.1	0.2	1.2	2.9	5.9	
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	31	High-End	0.7	1.1	7.3	18	37	30
		Central Tendency	1.7	3.3	17	43	87	
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	21	High-End	0.5	0.7	4.9	12	25	30
		Central Tendency	1.2	2.3	12	29	59	
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	18	High-End	0.4	0.6	4.2	11	21	30
		Central Tendency	1.0	1.9	10	25	50	

8913 **Table 4-24. Risk Estimation for Chronic, Cancer Inhalation Exposures for ConveyORIZED Vapor**  
 8914 **Degreasing**  
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Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
Cancer Risk liver tumors	2.0E-3	High-End	3.5E-2	2.3E-2	3.5E-3	1.4E-3	7.0E-4	10 <sup>-4</sup>
		Central Tendency	1.3E-2	7.0E-3	1.3E-3	5.4E-4	2.7E-4	

8916 <sup>1</sup> Data from JISA ([1993](#))  
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8918 **4.2.2.10 Web Degreasing**

8919 For web degreasing, exposure estimates for TWAs of 8 hrs are available based on modeling with a near-  
 8920 field and far-field approach. EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency  
 8921 and high-end exposure estimates, respectively. EPA used the near-field air concentrations for worker  
 8922 exposures and the far-field air concentrations for potential ONU inhalation exposures from PCE web  
 8923 degreasing as described in more detail above in Section 2.4.1.13. Considering the overall strengths and  
 8924 limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario  
 8925 is medium. Section 2.4.1.13 describes the justification for this occupational scenario confidence rating.  
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**Table 4-25. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Web Degreasing**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	2.8	4.3	28	69	139	10
		Central Tendency	8.2	16	82	205	409	

<sup>1</sup> Data from Altmann et al. (1990)

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**Table 4-26. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Web Degreasing**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	5.2	High- End	13	19	126	316	632	100
		Central Tendency	37	71	373	932	1,864	
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.1	High- End	5.1	7.9	51	128	255	30
		Central Tendency	15	29	151	376	753	
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	31	High- End	75	116	754	1,884	3,768	30
		Central Tendency	222	425	2,223	5,557	11,113	
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	21	High- End	51	79	510	1,276	2,552	30
		Central Tendency	151	288	1,506	3,764	7,528	
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	18	High- End	44	67	438	1,094	2,188	30
		Central Tendency	129	247	1,291	3,226	6,453	

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**Table 4-27. Risk Estimation for Chronic, Cancer Inhalation Exposures for Web Degreasing**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
Cancer Risk liver tumors	2.0E-3	High-End	3.3E-4	2.1E-4	3.3E-05	1.3E-5	6.6E-6	10 <sup>-4</sup>
		Central Tendency	1.1E-4	5.5E-5	1.1E-05	4.2E-6	2.1E-6	

<sup>1</sup> Data from JISA (1993)

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**4.2.2.11 Cold Cleaning**

For cold cleaning, exposure estimates for TWAs of 4 hrs and 8 hrs are available based on personal monitoring data samples, including 34 data points from two sources. EPA supplemented the identified 8-hr TWA exposure monitoring data using modeling with a near-field and far-field approach. For 8-hr TWAs from both monitoring data and modeling, EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. Due to the limited number of data points for 4-hr TWAs, EPA used the median and maximum to characterize the central tendency and high-end exposure estimates, respectively. EPA did not identify monitoring data for ONUs; therefore, EPA used the modeled near-field air concentrations for worker exposures and the modeled far-field air concentrations for potential ONU inhalation exposures from PCE cold cleaning as described in more detail above in Section 2.4.1.14. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium to high. Section 2.4.1.14 describes the justification for this occupational scenario confidence rating.

**Table 4-28. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Cold Cleaning**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
Based on exposure monitoring data								
8-hr	5.0	High-End	1.2	EPA did not identify monitoring data for ONUs	12	30	61	10
		Central Tendency	3.6		36	89	179	
Based on exposure modeling								
8-hr	5.0	High-End	3.3	6.4	33	81	163	10
		Central Tendency	2,086	4,029	20,857	52,142	104,284	

<sup>1</sup> Data from Altmann et al. (1990)

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**Table 4-29. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Cold Cleaning**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
Based on exposure monitoring data								
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	5.2	High-End	5.5	EPA did not identify monitoring data for ONUs	55	138	276	100
		Central Tendency	16		163	407	813	
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.1	High-End	2.2		22	56	111	30
		Central Tendency	6.6		66	164	329	
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	31	High-End	33		329	822	1,644	30
		Central Tendency	97		970	2,425	4,849	
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	21	High-End	22		223	557	1,114	30
		Central Tendency	66		657	1,643	3,285	
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	18	High-End	19		191	477	955	30
		Central Tendency	56		563	1,408	2,816	
Based on exposure modeling								
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	5.2	High-End	15	29	148	371	741	100
		Central Tendency	9,501	18,354	95,007	237,516	475,033	
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.1	High-End	6.0	12	60	150	299	30
		Central Tendency	3,837	7,412	38,368	95,920	191,840	
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	31	High-End	88	174	884	2,210	4,420	30
		Central Tendency	56,639	109,419	566,385	1,415,963	2,831,927	
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	21	High-End	60	118	599	1,497	2,994	30
		Central Tendency	38,368	74,123	383,680	959,201	1,918,402	
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	18	High-End	51	101	513	1,283	2,567	30
		Central Tendency	32,887	63,534	328,869	822,172	1,644,345	

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**Table 4-30. Risk Estimation for Chronic, Cancer Inhalation Exposures for Cold Cleaning**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator	Worker APF 10	Worker APF 25	Worker APF 50	
Based on exposure monitoring data								
Cancer Risk liver tumors	2.0E-3	High-End	9.7E-4	EPA did not identify monitoring data for ONUs	9.7E-5	3.9E-5	1.9E-5	10 <sup>-4</sup>
		Central Tendency	2.5E-4		2.4E-05	1.0E-5	5.1E-6	
Based on exposure modeling								
Cancer Risk liver tumors	2.0E-3	High-End	2.6E-4	1.3E-4	2.6E-5	1.0E-5	5.2E-6	10 <sup>-4</sup>
		Central Tendency	4.1E-7	2.1E-7	4.1E-8	1.6E-8	8.1E-9	

<sup>1</sup> Data from JISA (1993)

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**4.2.2.12 Aerosol Degreasing and Aerosol Lubricants**

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For aerosol degreasing and aerosol lubricants, exposure estimates for TWAs of 15 mins and 8 hrs are available based on personal monitoring data samples, including 197 data points from multiple sources. EPA supplemented the identified exposure monitoring data using modeling with a near-field and far-field approach to estimate 1- and 8-hr TWAs. For both monitoring data and modeling, EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. EPA did not identify monitoring data for ONUs; therefore, EPA used the modeled near-field air concentrations for worker exposures and the modeled far-field air concentrations for potential ONU inhalation exposures from PCE aerosol degreasing and aerosol lubricants as described in more detail above in Section 2.4.1.15. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is high. Section 2.4.1.15 describes the justification for this occupational scenario confidence rating

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**Table 4-31. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Aerosol Degreasing and Aerosol Lubricants**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
Based on exposure monitoring data								
8-hr	5.0	High-End	0.6	EPA did not identify monitoring data for ONUs	6.4	16	32	10
		Central Tendency	3.5		35	87	174	
Based on exposure modeling								
8-hr	5.0	High-End	0.3	6.8	2.9	7.3	15	10
		Central Tendency	0.9	50	9.1	23	46	

<sup>1</sup> Data from Altmann et al. (1990)

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<sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario.

**Table 4-32. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Aerosol Degreasing and Aerosol Lubricants**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)	
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>1</sup>	Worker APF 25 <sup>1</sup>	Worker APF 50 <sup>1</sup>		
Based on exposure monitoring data									
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	5.2	High-End	2.9	EPA did not identify monitoring data for ONUs	29	73	146	100	
		Central Tendency	16		158	396	792		
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.1	High-End	1.2		12	30	59	30	
		Central Tendency	6.4		64	160	320		
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	31	High-End	17		175	436	873	30	
		Central Tendency	94		944	2,360	4,720		
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	29	High-End	12		118	296	591	30	
		Central Tendency	64		639	1,599	3,197		
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	18	High-End	10		101	253	507	30	
		Central Tendency	55		548	1,370	2,740		
Based on exposure modeling									
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	5.2	High-End	1.3		31	13	33	66	100
		Central Tendency	4.2	260	42	104	208		
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.1	High-End	0.5	12	5.4	13	27	30	
		Central Tendency	1.7	105	17	42	84		
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	31	High-End	7.9	182	79	198	395	30	
		Central Tendency	25	1,550	248	620	1,240		
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	29	High-End	5.4	124	54	134	268	30	
		Central Tendency	17	1,050	168	420	840		
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	18	High-End	4.6	106	46	115	230	30	
		Central Tendency	14	900	144	360	720		

<sup>1</sup> EPA does not expect routine use of PPE with this exposure scenario.

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**Table 4-33. of Risk Estimation for Chronic, Cancer Inhalation Exposures for Aerosol Degreasing and Aerosol Lubricants**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
Based on exposure monitoring data								
Cancer Risk liver tumors	2.0E-3	High-End	1.8E-3	EPA did not identify monitoring data for ONUs	1.8E-4	7.3E-5	3.6E-5	10 <sup>-4</sup>
		Central Tendency	2.6E-4		2.6E-5	1.0E-5	5.2E-6	
Based on exposure modeling								
Cancer Risk liver tumors	2.0E-3	High-End	3.1E-3	1.4E-4	3.14E-4	1.3E-4	6.3E-5	10 <sup>-4</sup>
		Central Tendency	9.4E-4	2.0E-5	9.40E-5	3.8E-5	1.9E-5	

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<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario.

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**4.2.2.13 Dry Cleaning and Spot Cleaning**

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For dry cleaning, exposure estimates for TWAs of 15 mins and 8 hrs are available based on personal monitoring data samples, including 31 data points from two sources for post-2006 NESHAP data and 124 data points from multiple sources for fourth and fifth generation machine data. EPA supplemented the identified 8-hr TWA exposure monitoring data using modeling with a near-field and far-field approach. For both monitoring data and modeling, EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. The lone exception to this is for ONU monitoring data where, due to the limited number of data points, EPA used the median and maximum to characterize the central tendency and high-end exposure estimates, respectively, for fourth and fifth generation machine data and a single data point for the post-2006 NESHAP data. EPA used both monitoring data and the modeled far-field air concentrations for potential ONU inhalation exposures from PCE dry cleaning as described in more detail above in Section 2.4.1.16. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is high. Section 2.4.1.16 describes the justification for this occupational scenario confidence rating.

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**Table 4-34. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Dry Cleaning and Spot Cleaning**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
Post-2006 Dry Cleaning (including spot cleaning) - Based on exposure monitoring data								
8-hr	5.0	High-End	0.3	14 <sup>3</sup>	2.6	6.4	13	10
		Central Tendency	1.4		14	34	69	
Post-2006 Dry Cleaning (including spot cleaning) - Based on exposure modeling								
12-hr	3.3	High-End	0.1	2.1	1.1	2.8	5.6	10
		Central Tendency	2.4	30	24	59	118	
4th/5th Gen Only Dry Cleaning (including spot cleaning) - Based on exposure monitoring data								
8-hr	5.0	High-End	0.9	41	8.9	22	45	10
		Central Tendency	5.1	358	51	128	256	

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<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario.

<sup>3</sup> ONU exposure data for Post-2006 Dry Cleaning did not distinguish between central tendency and high-end.

**Table 4-35. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Dry Cleaning and Spot Cleaning**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>1</sup>	Worker APF 25 <sup>1</sup>	Worker APF 50 <sup>1</sup>	
Post-2006 Dry Cleaning (including spot cleaning) - Based on exposure monitoring data								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	1.0	56	10	25	50	100
		Central Tendency	6.1	64	61	152	303	
Kidney - Histopathology (JISA 1993)	2.1	High-End	0.4	23	4.0	10	20	30
		Central Tendency	2.4	26	24	61	122	
Liver - Vessel dilation (JISA 1993)	31	High-End	5.9	334	59	148	297	30
		Central Tendency	36	379	361	903	1,806	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	4.0	226	40	101	201	30
		Central Tendency	24	257	245	612	1,224	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	3.4	194	86	172	34	30
		Central Tendency	21	220	524	1,049	210	

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Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>1</sup>	Worker APF 25 <sup>1</sup>	Worker APF 50 <sup>1</sup>	
Post-2006 Dry Cleaning (including spot cleaning) - Based on exposure modeling								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	0.5	9.5	5.0	12	25	100
		Central Tendency	11	136	105	263	527	
Kidney - Histopathology (JISA 1993)	2.1	High-End	0.2	3.8	2.0	5.0	10	30
		Central Tendency	4.3	55	43	106	213	
Liver - Vessel dilation (JISA 1993)	31	High-End	3.0	56	30	74	148	30
		Central Tendency	63	809	628	1,569	3,139	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	2.0	38	20	50	100	30
		Central Tendency	43	548	425	1,063	2,126	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	1.7	33	17	43	86	30
		Central Tendency	36	470	365	911	1,823	
4th/5th Gen Only Dry Cleaning (including spot cleaning) - Based on exposure monitoring data								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	3.5	158	35	87	174	100
		Central Tendency	23	1,582	226	564	1,129	
Kidney - Histopathology (JISA 1993)	2.1	High-End	1.4	64	14	35	70	30
		Central Tendency	9.1	639	91	228	456	
Liver - Vessel dilation (JISA 1993)	31	High-End	21	944	207	518	1,036	30
		Central Tendency	135	9,432	1,346	3,364	6,728	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	14	639	140	351	702	30
		Central Tendency	91	6,389	912	2,279	4,558	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	12	548	120	301	602	30
		Central Tendency	78	5,476	781	1,953	3,907	

<sup>1</sup> EPA does not expect routine use of PPE with this exposure scenario.

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**Table 4-36. of Risk Estimation for Chronic, Cancer Inhalation Exposures for Dry Cleaning and Spot Cleaning**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per mg/m <sup>3</sup> )	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
Post-2006 Dry Cleaning (including spot cleaning) - Based on exposure monitoring data								
Cancer Risk liver tumors	2.0E-3	High-End	5.4E-3	9.5E-5	5.4E-4	2.1E-4	1.1E-4	10 <sup>-4</sup>
		Central Tendency	6.8E-4	6.5E-5	6.8E-5	2.7E-5	1.4E-5	
Post-2006 Dry Cleaning (including spot cleaning) - Based on exposure modeling								
Cancer Risk liver tumors	2.0E-3	High-End	8.1E-3	4.3E-4	8.1E-4	3.3E-4	1.6E-4	10 <sup>-4</sup>
		Central Tendency	3.8E-4	2.9E-5	3.8E-5	1.5E-5	7.6E-6	
4th/5th Gen Only Dry Cleaning (including spot cleaning) - Based on exposure monitoring data								
Cancer Risk liver tumors	2.0E-3	High-End	1.5E-3	3.4E-5	1.5E-4	6.1E-5	3.1E-5	10 <sup>-4</sup>
		Central Tendency	1.8E-4	2.6E-6	1.8E-5	7.3E-6	3.7E-6	

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<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario.

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**4.2.2.14 Adhesives, Sealants, Paints, and Coatings**

For adhesives, sealants, paints, and coatings, exposure estimates for TWAs of 15 mins and 8 hrs are available based on personal monitoring data samples, including 13 data points from one source for adhesives/sealants and 20 data points from multiple sources. For adhesives/sealants, discrete data points were not available; therefore, EPA used the mean and maximum reported in the study to characterize the central tendency and high-end, respectively. For 8-hr TWAs for paints/coatings, EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. Due to the limited number of data points for 15-min TWAs, EPA used the median and maximum to characterize the central tendency and high-end exposure estimates, respectively. EPA has not identified reasonably available data on potential ONU inhalation exposures from PCE adhesives, sealants, paints, and coatings. ONU inhalation exposures are expected to be lower than worker inhalation exposures however the relative exposure of ONUs to workers cannot be quantified as described in more detail above in Section 2.4.1.17. In lieu of data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium for workers and low for ONUs. Section 2.4.1.17 describes the justification for this occupational scenario confidence rating.

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**Table 4-37. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Adhesives, Sealants, Paints, and Coatings**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Paints/Coatings								
8-hr	5.0	High-End	1.1	21	11	27	55	10
		Central Tendency	21		214	536	1,071	
Adhesives								
8-hr	5.0	High-End	6.2	57	62	154	308	10
		Central Tendency	57		565	1,413	2,825	

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<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-38. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Adhesives, Sealants, Paints, and Coatings**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Paints/Coatings								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	5.0	98	50	125	250	100
		Central Tendency	98		976	2,440	4,881	
Kidney - Histopathology (JISA 1993)	2.1	High-End	2.0	39	20	50	101	30
		Central Tendency	39		394	986	1,971	
Liver - Vessel dilation (JISA 1993)	31	High-End	30	582	298	744	1,489	30
		Central Tendency	582		5,819	14,548	29,096	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	20	394	202	504	1,009	30
		Central Tendency	394		3,942	9,855	19,710	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	17	338	173	432	864	30
		Central Tendency	338		3,379	8,447	16,894	
Adhesives								
CNS -	5.2	High-	28	257	281	702	1,404	100

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)	
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25		Worker APF 50
Visual effects (U.S. EPA 2012c)		End						
		Central Tendency	257		2,574	6,434	12,868	
Kidney - Histopathology (JISA 1993)	2.1	High-End	11	104	113	283	567	30
		Central Tendency	104		1,039	2,598	5,197	
Liver - Vessel dilation (JISA 1993)	31	High-End	167	1,534	1,674	4,184	8,369	30
		Central Tendency	1,534		15,343	38,358	76,716	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	113	1,039	1,134	2,835	5,669	30
		Central Tendency	1,039		10,394	25,984	51,969	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	97	891	972	2,430	4,859	30
		Central Tendency	891		8,909	22,272	44,545	

<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-39. of Risk Estimation for Chronic, Cancer Inhalation Exposures for Adhesives, Sealants, Paints, and Coatings**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates				Benchmark	
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25		Worker APF 50
Paints/Coatings								
Cancer Risk	2.0E-3	High-End	1.1E-3	4.2E-5	1.1E-4	4.3E-5	2.1E-5	10 <sup>-4</sup>
		Central Tendency	4.2E-5		4.2E-6	1.7E-6	8.5E-7	
Adhesives								
Cancer Risk	2.0E-3	High-End	1.9E-4	1.6E-5	1.9E-5	7.6E-6	3.8E-6	10 <sup>-4</sup>
		Central Tendency	1.6E-5		1.6E-6	6.4E-7	3.2E-7	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

#### 4.2.2.15 Maskant for Chemical Milling

For maskant for chemical milling, exposure estimates for TWAs of 15 mins, 4 hrs, and 8 hrs are available based on personal monitoring data samples, including 53 data points from two sources. EPA calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. EPA has not identified reasonably available data on potential ONU inhalation exposures from PCE maskants for chemical milling. ONU inhalation exposures are expected to be lower than worker inhalation exposures however the relative exposure of ONUs to workers cannot be quantified as described in more detail above in Section 2.4.1.18. In lieu of data, EPA uses worker central tendency



9057 values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the  
 9058 data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium to  
 9059 high for workers and low for ONUs. Section 2.4.1.18 describes the justification for this occupational  
 9060 scenario confidence rating.

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**Table 4-40. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Maskant for Chemical Milling**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	2.4	4.1	24	59	119	10
		Central Tendency	4.1		41	103	206	

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<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-41. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Maskant for Chemical Milling**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
CNS - Visual effects (U.S. EPA 2012c)	5.2	High- End	11	19	108	271	541	100
		Central Tendency	19		188	470	939	
Kidney - Histopathology (JISA 1993)	2.1	High- End	4.4	7.6	44	109	219	30
		Central Tendency	7.6		76	190	379	
Liver - Vessel dilation (JISA 1993)	31	High- End	65	112	645	1,614	3,227	30
		Central Tendency	112		1,120	2,800	5,601	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High- End	44	76	437	1,093	2,186	30
		Central Tendency	76		759	1,897	3,794	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High- End	37	65	375	937	1,874	30
		Central Tendency	65		650	1,626	3,252	

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<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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**Table 4-42. Risk Estimation for Chronic, Cancer Inhalation Exposures for Maskant for Chemical Milling**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Cancer Risk	2.0E-3	High-End	4.9E-4	2.2E-4	4.9E-5	2.0E-5	9.9E-6	10 <sup>-4</sup>
		Central Tendency	2.2E-4		2.2E-5	8.8E-6	4.4E-6	

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<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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#### 4.2.2.16 Industrial Processing Aid

9079 For industrial processing aid, exposure estimates TWAs of 30 mins and 8 hrs are available based on  
9080 personal monitoring data samples, including 91 data points from multiple sources. For 8-hr TWAs, EPA  
9081 calculated 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates,  
9082 respectively. Due to the limited number of data points, EPA used the median and maximum to  
9083 characterize the central tendency and high-end exposure estimates for the 30-min TWA. EPA has not  
9084 identified reasonably available data on potential ONU inhalation exposures from PCE industrial  
9085 processing aids. ONU inhalation exposures are expected to be lower than worker inhalation exposures  
9086 however the relative exposure of ONUs to workers cannot be quantified as described in more detail  
9087 above in Section 2.4.1.19. In lieu of data, EPA uses worker central tendency values as a surrogate to  
9088 estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall  
9089 confidence in the occupational inhalation estimates in this scenario is medium for workers and low for  
9090 ONUs. Section 2.4.1.19 describes the justification for this occupational scenario confidence rating.

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**Table 4-43. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Industrial Processing Aid**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	4.2	83	42	106	212	10
		Central Tendency	83		833	2,083	4,167	

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<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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**Table 4-44. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Industrial Processing Aid**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
CNS -	5.2	High-	19	380	193	483	965	100

Visual effects (U.S. EPA 2012c)		End						
		Central Tendency	380					
Kidney - Histopathology (JISA 1993)	2.1	High-End	7.8	153				30
		Central Tendency	153					
Liver - Vessel dilation (JISA 1993)	31	High-End	115	2,263				30
		Central Tendency	2,263					
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	78	1,533				30
		Central Tendency	1,533					
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	67	1,314				30
		Central Tendency	1,314					

<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-45. Risk Estimation for Chronic, Cancer Inhalation Exposures for Industrial Processing Aid**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Cancer Risk	2.0E-3	High-End	2.8E-4	1.1E-5	2.8E-5	1.1E-5	5.5E-6	10 <sup>-4</sup>
		Central Tendency	1.1E-5		1.1E-6	4.4E-7	2.2E-7	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

#### 4.2.2.17 Metalworking Fluids

For metalworking fluids, exposure estimates for TWAs of 8 hrs are available based on estimates from the Emission Scenario Document (ESD) on the Use of Metalworking Fluids (OECD 2011). EPA uses the geometric mean and 90<sup>th</sup> percentile as presented in the ESD to characterize the central tendency and high-end exposure estimates, respectively. EPA has not identified reasonably available data on potential ONU inhalation exposures from PCE metalworking fluids. ONU inhalation exposures are expected to be lower than worker inhalation exposures however the relative exposure of ONUs to workers cannot be quantified as described in more detail above in Section 2.4.1.20. In lieu of data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium for workers and low for ONUs. Section 2.4.1.20 describes the justification for this occupational scenario confidence rating.

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**Table 4-46. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Metalworking Fluids**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10 <sup>3</sup>	Worker APF 25 <sup>3</sup>	Worker APF 50 <sup>3</sup>	
8-hr	5.0	High-End	239	869	2,387	5,968	11,937	10
		Central Tendency	869		8,692	21,731	43,462	

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<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

<sup>3</sup> EPA does not assume routine use of PPE with this exposure scenario.

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**Table 4-47. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Metalworking Fluids**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	5.2	High- End	1,087	3,960	10,875	27,187	54,374	100
		Central Tendency	3,960		39,595	98,988	197,976	
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.1	High- End	439	1,599	4,392	10,979	21,959	30
		Central Tendency	1,599		15,990	39,976	79,952	
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	31	High- End	6,483	23,605	64,830	162,075	324,151	30
		Central Tendency	23,605		236,048	590,121	1,180,242	
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	21	High- End	4,392	15,990	43,917	109,793	219,586	30
		Central Tendency	15,990		159,904	399,759	799,518	
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	18	High- End	3,764	13,706	37,643	94,108	188,217	30
		Central Tendency	13,706		137,060	342,651	685,302	

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<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

<sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario.

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**Table 4-48 Risk Estimation for Chronic, Cancer Inhalation Exposures for Metalworking Fluids**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10 <sup>3</sup>	Worker APF 25 <sup>3</sup>	Worker APF 50 <sup>3</sup>	
Cancer Risk liver tumors	2.0E-3	High-End	4.9E-6	1.0E-6	4.9E-7	2.0E-7	9.8E-8	10 <sup>-4</sup>
		Central Tendency	1.0E-6		1.0E-7	4.2E-8	2.1E-8	

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<sup>1</sup> Data from JISA (1993)

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<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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<sup>3</sup> EPA does not expect routine use of PPE with this exposure scenario.

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**4.2.2.18 Wipe Cleaning and Metal/Stone Polishes**

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For wipe cleaning and metal/stone polishes, exposure estimates for TWAs of 15 mins, 4 hrs, and 8 hrs are available based on personal monitoring data samples, including 20 data points from two sources. For 8-hr TWAs for ONUs and 15-min TWAs for workers, EPA uses the 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively. Due to the limited number of data points, EPA used the median and maximum to characterize the central tendency and high-end exposure estimates, respectively, for worker 8-hr TWAs. The 4-hr TWA estimates are based on a single data point. EPA identified 6 of the 20 data points to be for ONU exposures for wipe cleaning as described in more detail above in Section 2.4.1.21. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium. Section 2.4.1.21 describes the justification for this occupational scenario confidence rating.

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**Table 4-49. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Wipe Cleaning and Metal/Stone Polishes**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
8-hr	5.0	High-End	2.2E-2	0.2	0.2	0.5	1.1	10
		Central Tendency	3.8E-2	229	0.4	0.9	1.9	

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<sup>1</sup> Data from Altmann et al. (1990)

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<sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario

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**Table 4-50. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Wipe Cleaning and Metal/Stone Polishes**

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Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>1</sup>	Worker APF 25 <sup>1</sup>	Worker APF 50 <sup>1</sup>	
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	0.1	1.0	1.0	2.5	5.0	100
		Central Tendency	0.2	1,043	1.7	4.3	8.6	
Kidney - Histopathology	2.1	High-End	4.0E-2	0.4	0.4	1.0	2.0	30

(JISA 1993)		Central Tendency	7.0E-2	421	0.7	1.7	3.5	
Liver - Vessel dilation (JISA 1993)	31	High-End	0.6	5.9	6.0	15	30	30
		Central Tendency	1.0	6,220	10	26	51	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	0.4	4.0	4.0	10	20	30
		Central Tendency	0.7	4,213	7.0	17	35	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	0.3	3.4	3.5	8.6	17	30
		Central Tendency	0.6	3,611	6.0	15	30	

<sup>1</sup> EPA does not expect routine use of PPE with this exposure scenario

**Table 4-51. of Risk Estimation for Chronic, Cancer Inhalation Exposures for Wipe Cleaning and Metal/Stone Polishes**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
Cancer Risk	2.0E-3	High-End	5.3E-2	5.4E-3	5.3E-3	2.1E-3	1.1E-3	10 <sup>-4</sup>
		Central Tendency	2.4E-2	4.0E-6	2.4E-3	9.6E-4	4.8E-4	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario

**4.2.2.19 Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)**

For other spot cleaning/spot removers (including carpet cleaning), exposure estimates for TWAs of 8 hrs are available based on personal monitoring data samples, including 3 data points from one source. Due to the limited number of data points, EPA used the median and maximum to characterize the central tendency and high-end exposure estimates, respectively, for worker 8-hr TWAs. The 8-hr TWA estimates for ONUs are based on a single data point. EPA identified 1 of the 3 data points to be for ONU exposures for other spot cleaning/spot removers (including carpet cleaning) as described in more detail above in Section 2.4.1.22. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium. Section 2.4.1.22 describes the justification for this occupational scenario confidence rating.

**Table 4-52. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10 <sup>3</sup>	Worker APF 25 <sup>3</sup>	Worker APF 50 <sup>3</sup>	
8-hr	5.0	High-End	22	167	217	542	1,084	10
		Central Tendency	29		291	727	1,455	

<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> ONU exposure data did not distinguish central tendency and high-end.

9179 <sup>3</sup> EPA does not expect routine use of PPE with this exposure scenario.

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9181 **Table 4-53. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Other Spot**  
 9182 **Cleaning/Spot Removers (Including Carpet Cleaning)**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU <sup>1</sup> No respirator	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	99	759	987	2,468	4,936	100
		Central Tendency	133		1,325	3,313	6,627	
Kidney - Histopathology (JISA 1993)	2.1	High-End	40	307	399	997	1,993	30
		Central Tendency	54		535	1,338	2,676	
Liver - Vessel dilation (JISA 1993)	31	High-End	588	4,526	5,885	14,712	29,424	30
		Central Tendency	790		7,901	19,752	39,504	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	399	3,066	3,986	9,966	19,932	30
		Central Tendency	535		5,352	13,381	26,761	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	342	2,628	3,417	8,542	17,085	30
		Central Tendency	459		4,588	11,469	22,938	

9183 <sup>1</sup> ONU exposure data did not distinguish central tendency and high-end

9184 <sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario.

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9186 **Table 4-54. of Risk Estimation for Chronic, Cancer Inhalation Exposures for Other Spot**  
 9187 **Cleaning/Spot Removers (Including Carpet Cleaning)**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
Cancer Risk	2.0E-3	High-End	5.4E-5	7.0E-6	5.4E-6	2.2E-6	1.1E-6	10 <sup>-4</sup>
		Central Tendency	3.1E-5	5.4E-6	3.1E-6	1.2E-6	6.2E-7	

9188 <sup>1</sup> Data from JISA (1993)

9189 <sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario.

9190 **4.2.2.20 Other Industrial Uses**

9191 For other industrial uses, exposure estimates for TWAs of 30 mins, 1 hrs, and 8 hrs are available based  
 9192 on modeling. EPA characterized the central tendency exposure estimates assuming unloading/loading of  
 9193 a tank truck and the high-end assuming unloading/loading of a railcar. EPA has not identified reasonably  
 9194 available data on potential ONU inhalation exposures from other industrial uses. ONU inhalation  
 9195 exposures are expected to be lower than worker inhalation exposures however the relative exposure of  
 9196 ONUs to workers cannot be quantified as described in more detail above in Section 2.4.1.23. In lieu of  
 9197 data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering  
 9198 the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation

9199 estimates in this scenario is medium for workers and low for ONUs. Section 2.4.1.23 describes the  
 9200 justification for this occupational scenario confidence rating.

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 9202 **Table 4-55. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Other Industrial**  
 9203 **Uses**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	139	628	1,390	3,475	6,949	10
		Central Tendency	628		6,284	15,710	31,419	

9204 <sup>1</sup> Data from Altmann et al. (1990)

9205 <sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a  
 9206 surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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 9208 **Table 4-56. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Other Industrial**  
 9209 **Uses**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	633	2,862	6,331	15,828	31,656	100
		Central Tendency	2,862		28,624	71,560	143,120	
Kidney - Histopathology (JISA 1993)	2.1	High-End	256	1,156	2,557	6,392	12,784	30
		Central Tendency	1,156		11,560	28,899	57,798	
Liver - Vessel dilation (JISA 1993)	31	High-End	3,774	17,064	37,743	94,358	188,716	30
		Central Tendency	17,064		170,643	426,608	853,216	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	2,557	11,560	25,568	63,920	127,840	30
		Central Tendency	11,560		115,597	288,992	577,985	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	2,192	9,908	21,915	54,788	109,577	30
		Central Tendency	9,908		99,083	247,708	495,416	

9210 <sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a  
 9211 surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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**Table 4-57. Risk Estimation for Chronic, Cancer Inhalation Exposures for Other Industrial Uses**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Cancer Risk	2.0E-3	High-End	8.4E-6	1.4E-6	8.4E-7	3.4E-7	1.7E-7	10 <sup>-4</sup>
		Central Tendency	1.4E-6		1.4E-7	5.8E-8	2.9E-8	

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<sup>1</sup> Data from JISA (1993)

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<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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**4.2.2.21 Other Commercial Uses**

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For other commercial uses, exposure estimates for TWAs of 15 mins and 8 hrs are available based on personal monitoring data samples, including 24 data points for printing applications, 3 data points for photocopying, and 102 data points for photographic film applications. Exposure estimates for mold release products are based on area monitoring data samples, including 4 data points from one source. EPA calculated the 50<sup>th</sup> and 95<sup>th</sup> percentiles to characterize the central tendency and high-end exposure estimates, respectively, for 8-hr TWAs for printing applications and 15-min and 8-hr TWAs for photographic film applications. Due to the limited number of data points, EPA used the median and maximum to characterize the central tendency and high-end exposure estimates, respectively, photocopying. The 15-min TWA exposure estimates for printing applications is based on a single data point. For mold release products, discrete data points were not available; therefore, EPA used the mean and maximum reported in the study to characterize the central tendency and high-end, respectively. EPA has not identified reasonably available data on potential ONU inhalation exposures from other commercial uses. ONU inhalation exposures are expected to be lower than worker inhalation exposures however the relative exposure of ONUs to workers cannot be quantified as described in more detail above in Section 2.4.1.24. In lieu of data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium to high for printing, photographic film, and photocopying workers, medium for mold release workers, and low for ONUs. Section 2.4.1.24 describes the justification for this occupational scenario confidence rating.

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**Table 4-58. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Other Commercial Uses**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10 <sup>3</sup>	Worker APF 25 <sup>3</sup>	Worker APF 50 <sup>3</sup>	
Printing								
8-hr	5.0	High-End	0.8	2.6	8.4	21	42	10
		Central Tendency	2.6		26	65	130	
Photocopying								
8-hr	5.0	High-End	10,000	26,667	100,000	250,000	500,000	10
		Central Tendency	26,667		266,667	666,667	1,333,333	

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10 <sup>3</sup>	Worker APF 25 <sup>3</sup>	Worker APF 50 <sup>3</sup>	
Photographic Film								
8-hr	5.0	High-End	8.9E-2	0.8	0.9	2.2	4.4	10
		Central Tendency	0.8		7.9	20	40	
Mold Release								
8-hr	5.0	High-End	25	50	250	625	1,250	10
		Central Tendency	50		500	1,250	2,500	

<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

<sup>3</sup> EPA does not expect routine use of PPE with this exposure scenario (including all sub-scenarios).

**Table 4-59. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Other Commercial Uses**

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
Printing								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High- End	3.8	12	38	96	192	100
		Central Tendency	12		119	297	594	
Kidney - Histopathology (JISA 1993)	2.1	High- End	1.5	4.8	15	39	77	30
		Central Tendency	4.8		48	120	240	
Liver - Vessel dilation (JISA 1993)	31	High- End	23	71	228	571	1,142	30
		Central Tendency	71		708	1,770	3,541	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High- End	15	48	155	387	774	30
		Central Tendency	48		480	1,199	2,399	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High- End	13	41	133	332	663	30
		Central Tendency	41		411	1,028	2,056	
Photocopying								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High- End	45,552	121,472	455,520	1,138,800	2,277,600	100
		Central Tendency	121,472		1,214,720	3,036,800	6,073,600	
Kidney - Histopathology	2.1	High- End	18,396	49,056	183,960	459,900	919,800	30

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Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
( <a href="#">JISA 1993</a> )		Central Tendency	49,056		490,560	1,226,400	2,452,800	
<b>Liver - Vessel dilation</b> ( <a href="#">JISA 1993</a> )	31	High-End	271,560	724,160	2,715,600	6,789,000	13,578,000	30
		Central Tendency	724,160		7,241,600	18,104,000	36,208,000	
<b>Reproductive - Sperm effects</b> ( <a href="#">Beliles et al. 1980</a> )	21	High-End	183,960	490,560	1,839,600	4,599,000	9,198,000	30
		Central Tendency	490,560		4,905,600	12,264,000	24,528,000	
<b>Developmental - Mortality/ CNS effects</b> ( <a href="#">Tinston 1994</a> )	18	High-End	157,680	420,480	1,576,800	3,942,000	7,884,000	30
		Central Tendency	420,480		4,204,800	10,512,000	21,024,000	
Photographic Film								
<b>CNS - Visual effects</b> ( <a href="#">U.S. EPA 2012c</a> )	5.2	High-End	<b>0.4</b>	<b>3.6</b>	<b>4.0</b>	<b>10</b>	<b>20</b>	100
		Central Tendency	<b>3.6</b>		<b>36</b>	<b>90</b>	181	
<b>Kidney - Histopathology</b> ( <a href="#">JISA 1993</a> )	2.1	High-End	<b>0.2</b>	<b>1.5</b>	<b>1.6</b>	<b>4.1</b>	<b>8.2</b>	30
		Central Tendency	<b>1.5</b>		<b>15</b>	37	73	
<b>Liver - Vessel dilation</b> ( <a href="#">JISA 1993</a> )	31	High-End	<b>2.4</b>	<b>22</b>	<b>24</b>	60	120	30
		Central Tendency	<b>22</b>		216	539	1,079	
<b>Reproductive - Sperm effects</b> ( <a href="#">Beliles et al. 1980</a> )	21	High-End	<b>1.6</b>	<b>15</b>	<b>16</b>	41	82	30
		Central Tendency	<b>15</b>		146	365	731	
<b>Developmental - Mortality/ CNS effects</b> ( <a href="#">Tinston 1994</a> )	18	High-End	<b>1.4</b>	<b>13</b>	<b>14</b>	35	70	30
		Central Tendency	<b>13</b>		125	313	626	
Mold Release								
<b>CNS - Visual effects</b> ( <a href="#">U.S. EPA 2012c</a> )	5.2	High-End	114	228	1,139	2,847	5,694	100
		Central Tendency	228		2,278	5,694	11,388	
<b>Kidney - Histopathology</b> ( <a href="#">JISA 1993</a> )	2.1	High-End	46	92	460	1,150	2,300	30
		Central Tendency	92		920	2,300	4,599	
<b>Liver - Vessel dilation</b> ( <a href="#">JISA 1993</a> )	31	High-End	679	1,358	6,789	16,973	33,945	30
		Central Tendency	1,358		13,578	33,945	67,890	

Endpoint	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10 <sup>2</sup>	Worker APF 25 <sup>2</sup>	Worker APF 50 <sup>2</sup>	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	460	920	4,599	11,498	22,995	30
		Central Tendency	920		9,198	22,995	45,990	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	394	788	3,942	9,855	19,710	30
		Central Tendency	788		7,884	19,710	39,420	

<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

<sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario (including all sub-scenarios).

**Table 4-60. Risk Estimation for Chronic, Cancer Inhalation Exposures for Other Commercial Uses**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10 <sup>3</sup>	Worker APF 25 <sup>3</sup>	Worker APF 50 <sup>3</sup>	
Printing								
Cancer Risk	2.0E-3	High-End	1.4E-3	3.5E-4	1.4E-4	5.6E-5	2.8E-5	10 <sup>-4</sup>
		Central Tendency	3.5E-4		3.5E-5	1.4E-5	7.0E-6	
Photocopying								
Cancer Risk	02.0E-3	High-End	1.2E-7	3.4E-8	1.2E-8	4.7E-9	2.3E-9	10 <sup>-4</sup>
		Central Tendency	3.4E-8		3.4E-9	1.4E-9	6.8E-10	
Photographic Film								
Cancer Risk	2.0E-3	High-End	1.3E-2	1.1E-3	1.3E-3	5.3E-4	2.6E-4	10 <sup>-4</sup>
		Central Tendency	1.1E-3		1.1E-4	4.6E-5	2.3E-5	
Mold Release								
Cancer Risk	2.0E-3	High-End	4.7E-5	1.8E-5	4.7E-6	1.9E-6	9.4E-7	10 <sup>-4</sup>
		Central Tendency	1.8E-5		1.8E-6	7.3E-7	3.6E-7	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

<sup>3</sup> EPA does not expect routine use of PPE with this exposure scenario (including all sub-scenarios).

**4.2.2.22 Laboratory Chemicals**

EPA does not have data to assess worker exposures to PCE during laboratory use. However, due to the expected safety practices when using chemicals in a laboratory setting, PCE is expected to be applied in small amounts under a fume hood, thus reducing the potential for inhalation exposures.

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**4.2.2.23 Waste Handling, Disposal, Treatment, and Recycling**

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For waste handling, disposal, treatment, and recycling, exposure estimates for TWAs of 30 mins, 1 hrs, and 8 hrs are available based on modeling. EPA characterized the central tendency exposure estimates assuming unloading/loading of a tank truck and the high-end assuming unloading/loading of a railcar. EPA has not identified reasonably available data on potential ONU inhalation exposures from waste handling, disposal, treatment, and recycling. ONU inhalation exposures are expected to be lower than worker inhalation exposures however the relative exposure of ONUs to workers cannot be quantified as described in more detail above in Section 2.4.1.26. In lieu of data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is medium for workers and low for ONUs. Section 2.4.1.26 describes the justification for this occupational scenario confidence rating.

**Table 4-61. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Waste Handling, Disposal, Treatment, and Recycling**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
8-hr	5.0	High-End	139	628	1,390	3,475	6,949	10
		Central Tendency	628		6,284	15,710	31,419	

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<sup>1</sup> Data from Altmann et al. (1990)

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<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

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**Table 4-62. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Waste Handling, Disposal, Treatment, and Recycling**

Endpoint <sup>1</sup>	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	633	2,862	6,331	15,828	31,656	100
		Central Tendency	2,862		28,624	71,560	143,120	
Kidney - Histopathology (JISA 1993)	2.1	High-End	256	1,156	2,557	6,392	12,784	30
		Central Tendency	1,156		11,560	28,899	57,798	
Liver - Vessel dilation (JISA 1993)	31	High-End	3,774	17,064	37,743	94,358	188,716	30
		Central Tendency	17,064		170,643	426,608	853,216	
	21	High-	3,531	15,963	35,308	88,270	176,540	30

Endpoint <sup>1</sup>	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Reproductive - Sperm effects (Beliles et al. 1980)		End						
		Central Tendency	15,963		159,634	399,085	798,170	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	2,557	11,560	25,568	63,920	127,840	30
		Central Tendency	11,560		115,597	288,992	577,985	

<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-63. Risk Estimation for Chronic, Cancer Inhalation Exposures for Waste Handling, Disposal, Treatment, and Recycling**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Cancer Risk	2.0E-3	High-End	8.4E-6	1.4E-6	8.4E-7	3.4E-7	1.7E-7	10 <sup>-4</sup>
		Central Tendency	1.4E-6		1.4E-7	5.8E-8	2.9E-8	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

#### 4.2.2.24 Other Department of Defense Uses

For other department of defense uses, exposure estimates TWAs of 15 mins, 1 hr, and 8 hrs are available based on personal monitoring data samples, including 4 data points from multiple sources. For the oil analysis results exposure results are based on a single data point (one for each TWA duration). For the water pipe repair, only one data point was available that measured below the LOD; therefore, EPA characterized the central tendency and high-end exposures as half the LOD and the LOD, respectively. EPA has not identified reasonably available data on potential ONU inhalation exposures from other department of defense uses. ONU inhalation exposures are expected to be lower than worker inhalation exposures however the relative exposure of ONUs to workers cannot be quantified as described in more detail above in Section 2.4.1.27. In lieu of data, EPA uses worker central tendency values as a surrogate to estimate risks for ONUs. Considering the overall strengths and limitations of the data, EPA's overall confidence in the occupational inhalation estimates in this scenario is high for workers and low for ONUs. Section 2.4.1.27 describes the justification for this occupational scenario confidence rating.

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**Table 4-64. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Other Department of Defense Uses**

HEC Time Period Endpoint = CNS Effects <sup>1</sup>	Acute HEC (ppm)	Exposure Level	MOEs for Acute Exposures					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Water Pipe Repair								
8-hr	5.0	High-End	2.2	4.3	22	54	108	10
		Central Tendency	4.3		43	108	216	
Oil Analysis <sup>3</sup>								
8-hr	5.0	High-End	5.7	5.7	57	142	284	10
		Central Tendency						

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<sup>1</sup> Data from Altmann et al. (1990)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

<sup>3</sup> Oil analysis exposure data did not distinguish between central tendency and high-end.

**Table 4-65. Risk Estimation for Chronic, Non-Cancer Inhalation Exposures for Other Department of Defense Uses**

Endpoint <sup>1</sup>	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Water Pipe Repair								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	68	164	684	1,710	3,420	100
		Central Tendency	164		1,642	4,104	8,208	
Kidney - Histopathology (JISA 1993)	2.1	High-End	28	66	276	691	1,381	30
		Central Tendency	66		663	1,657	3,315	
Liver - Vessel dilation (JISA 1993)	31	High-End	408	979	4,077	10,194	20,387	30
		Central Tendency	979		9,786	24,465	48,930	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	276	633	2,762	6,905	13,811	30
		Central Tendency	663		6,629	16,573	33,146	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	237	568	2,368	5,919	11,838	30
		Central Tendency	568		5,682	14,205	28,411	
Oil Analysis								
CNS - Visual effects (U.S. EPA 2012c)	5.2	High-End	43	52	431	1,077	2,154	100
		Central Tendency	52		517	1,293	2,585	

Endpoint <sup>1</sup>	Chronic HEC (ppm)	Exposure Level	MOEs for Chronic Exposure					Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator <sup>1</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Kidney - Histopathology (JISA 1993)	2.1	High-End	17	21	174	435	870	30
		Central Tendency	21		209	522	1,044	
Liver - Vessel dilation (JISA 1993)	31	High-End	257	308	2,569	6,422	12,843	30
		Central Tendency	308		3,082	7,706	15,412	
Reproductive - Sperm effects (Beliles et al. 1980)	21	High-End	240	288	2,403	6,007	12,014	30
		Central Tendency	288		2,883	7,209	14,417	
Developmental - Mortality/ CNS effects (Tinston 1994)	18	High-End	174	209	1740	4350	8700	30
		Central Tendency	209		2088	5220	10440	

<sup>1</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

**Table 4-66. Risk Estimation for Chronic, Cancer Inhalation Exposures for Other Department of Defense Uses**

Endpoint, Tumor Types <sup>1</sup>	IUR (risk per ppm)	Exposure Level	Cancer Risk Estimates					Benchmark
			Worker No respirator	ONU No respirator <sup>2</sup>	Worker APF 10	Worker APF 25	Worker APF 50	
Water Pipe Repair								
Cancer Risk	2.0E-3	High-End	7.8E-05	2.5E-05	7.8E-06	3.1E-6	1.6E-6	10 <sup>-4</sup>
		Central Tendency	2.5E-05		2.5E-06	1.0E-6	5.0E-7	
Oil Analysis								
Cancer Risk	2.0E-3	High-End	1.2E-04	8.0E-05	1.2E-05	5.0E-6	2.5E-6	10 <sup>-4</sup>
		Central Tendency	8.0E-05		8.0E-06	3.2E-6	1.6E-6	

<sup>1</sup> Data from JISA (1993)

<sup>2</sup> EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown.

### 4.2.3 Risk Estimation for Dermal Exposures to Workers

To assess dermal exposure, EPA used the *Dermal Exposure to Volatile Liquids Model* (see Section 2.4.1.5 ) to calculate the dermal retained dose. EPA “binned” exposure scenarios based on likely level of exposure. Overall, EPA has a medium level of confidence in the assessed baseline exposure. The hazard HEDs are summarized in Table 3-7,

Table 3-8 and Table 3-9. From among all chronic studies, EPA selected the most robust studies and non-cancer PODs from within each health domain to serve as representative endpoints for risk estimation (Section 3.2.5.4). These representative PODs are presented below in Table 4-2 along with the single acute POD. Dermal PODs were calculated as extrapolated from both inhalation and oral POD values,



9333 when possible (Section 3.2.5.4.1 and Table 3-10). When extrapolation was available via both routes, the  
 9334 more sensitive POD was selected in order to be health-protective given the relative similarity in  
 9335 magnitude of uncertainties via either route. Of note, in all cases the difference in the derived dermal  
 9336 POD between routes is no more than approximately 2-fold. The dermal POD value to be used for risk  
 9337 estimates is bold in the table below. Non-cancer risk estimates were calculated with equation 4-1 and  
 9338 cancer risks were calculated with equation 4-2.

9339 **Table 4-67. Selected Non-cancer PODs for Use in Risk Estimation of Dermal Exposures**

Target Organ System and Effect	Inhalation POD and Duration	Inhalation to Dermal Adjustments	Inhalation to Dermal HED (mg/kg-day)	Oral to Dermal HED (mg/kg-day)	Total Uncertainty Factor (UF) for Benchmark MOE	Reference	Data Quality
<b>ACUTE EXPOSURE</b>							
CNS Neurotoxicity increased latencies for pattern reversal visual-evoked potentials	10 ppm (68 mg/m <sup>3</sup> ) 4 hrs/day	1.25 m <sup>3</sup> /hr 4 hrs/day 80 kg BW	<b>4.25</b>	N/A	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=10</b>	Altmann et al. (1990)	Medium
<b>CHRONIC EXPOSURE</b>							
Midpoint of the range of the two neurotoxicity endpoints	5.2 ppm (36 mg/m <sup>3</sup> )	20 m <sup>3</sup> /day 80 kg BW	9.0	<b>6.2</b>	UF <sub>A</sub> =1; UF <sub>H</sub> =10; UF <sub>L</sub> =10 <b>Total UF=100</b>	Based on U.S. EPA (2012c)	Medium
Kidney Nuclear enlargement in proximal tubules	2.1 ppm (14 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	3.5	<b>2.2</b>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	JISA (, 1993, 630653)	High
Liver Increased angiectasis in liver	31 ppm (210 mg/m <sup>3</sup> ) 24 hrs/day	20 m <sup>3</sup> /day 80 kg BW	52.5	<b>24.5</b>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	JISA (1993)	High
Developmental Reduced sperm quality following 5 days exposure	21 ppm (140 mg/m <sup>3</sup> )	20 m <sup>3</sup> /day 80 kg BW	35	<b>22</b>	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	Beliles et al. (1980)	High
Developmental Increased F <sub>2A</sub> pup deaths by Day 29, CNS depression in F <sub>1</sub> and F <sub>2</sub>	18 ppm (122 mg/m <sup>3</sup> )	20 m <sup>3</sup> /day 80 kg BW	<b>31</b>	N/A	UF <sub>A</sub> =3; UF <sub>H</sub> =10; UF <sub>L</sub> =1 <b>Total UF=30</b>	Tinston et al. (1994)	High
<b>CANCER</b>							
male mouse hepatocellular tumors	3 × 10 <sup>-4</sup> per mg/m <sup>3</sup>	20 m <sup>3</sup> /day 80 kg BW	1 × 10 <sup>-3</sup> per mg/kg/day	<b>2 × 10<sup>-3</sup> per mg/kg/day</b>	Not applicable	JISA (1993)	High

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**4.2.3.1 Industrial Uses That Generally Occur in Closed Systems**

For these uses, dermal exposure is likely limited to chemical loading/unloading activities (e.g. connecting hoses) and taking quality control samples. The exposure scenarios include:

- Manufacture
- Import/Repackaging
- Processing as a Reactant
- Incorporation into Formulation, Mixture, or Reaction Product
- Industrial Processing Aid
- Other Industrial Uses
- Waste Handling, Disposal, Treatment, and Recycling

**Table 4-68. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Industrial Uses That Generally Occur in Closed Systems**

Endpoint <sup>1</sup>	Acute HED (mg/kg/day)	Exposure Level	MOEs for Acute Exposures				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
CNS - Visual effects (U.S. EPA 2012c)	4.3	High-End	1.2	6.0	12	24	10
		Central Tendency	3.6	18	36	72	

<sup>1</sup> Based on route to route extrapolation from inhalation exposure data from Altmann et al. (1990) see Table 3-7

**Table 4-69. Risk Estimation for Chronic, Non-Cancer Dermal Exposures for Industrial Uses That Generally Occur in Closed Systems**

Endpoint	Chronic HED (mg/kg/day)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
CNS - Visual effects (U.S. EPA 2012c)	6.2	High-End	2.6	13	26	51	100
		Central Tendency	7.7	38	77	154	
Kidney - Histopathology (JISA 1993)	2.2	High-End	0.9	4.6	9.1	18	30
		Central Tendency	2.7	14	27	55	
Liver - Vessel dilation (JISA 1993)	24.5	High-End	10	51	101	203	30
		Central Tendency	30	152	304	608	
Reproductive - Sperm effects (Beliles et al. 1980)	22	High-End	9.1	45	91	182	30
		Central Tendency	27	136	273	546	
Developmental - Mortality/ CNS effects (Tinston 1994)	31	High-End	13	64	128	256	30
		Central Tendency	38	192	384	769	

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**Table 4-70. Risk Estimation for Chronic, Cancer Dermal Exposures for Industrial Uses That Generally Occur in Closed Systems**

Endpoint, Tumor Types <sup>1</sup>	Dermal slope factor (risk per mg/kg/day)	Exposure Level	Cancer Risk Estimates				Benchmark
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
Cancer Risk liver tumors	2.0E-3	High-End	2.5E-3	5.0E-4	2.5E-4	1.2E-4	10 <sup>-4</sup>
		Central Tendency	6.4E-4	1.3E-4	6.4E-5	3.2E-5	

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<sup>1</sup> Based on route to route extrapolation from the oral slope factor using data from JISA (1993)

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**4.2.3.2 Industrial Degreasing and Chemical Maskant Uses Which Are Not Closed Systems**

9365 For these uses, there is greater opportunity for dermal exposure during activities such as charging and  
9366 draining degreasing/milling equipment, drumming waste solvent, handling recycled/re-captured  
9367 maskants, and removing waste sludge. The exposure scenarios include:

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- Batch Open-Top Vapor Degreasing
- Batch Closed-Loop Vapor Degreasing
- Conveyorized Vapor Degreasing
- Web Degreasing
- Cold Cleaning
- Maskant for Chemical Milling

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**Table 4-71. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Industrial Degreasing and Chemical Maskant Uses Which Are Not Closed Systems**

Endpoint <sup>1</sup>	Acute HED (mg/kg/day)	Exposure Level	MOEs for Acute Exposures				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
CNS - Visual effects (U.S. EPA 2012c)	4.3	High-End	1.2	6.0	12	24	10
		Central Tendency	3.6	18	36	72	

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<sup>1</sup> Based on route to route extrapolation from inhalation exposure data from Altmann et al. (1990) see Table 3-7

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**Table 4-72. Risk Estimation for Chronic, Non-Cancer Dermal Exposures for Industrial Degreasing and Chemical Maskant Uses Which Are Not Closed Systems**

Endpoint	Chronic HED (mg/kg/day)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
CNS - Visual effects (U.S. EPA 2012c)	6.2	High-End	2.6	13	26	51	100
		Central Tendency	7.7	38	77	154	
Kidney - Histopathology	2.2	High-End	0.9	4.5	9.1	18	30

Endpoint	Chronic HED (mg/kg/day)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
(JISA 1993)		Central Tendency	2.7	14	27	55	
Liver - Vessel dilation (JISA 1993)	24.5	High-End	10	51	101	203	30
		Central Tendency	30	152	304	608	
Reproductive - Sperm effects (Beliles et al. 1980)	22	High-End	9.1	45	91	182	30
		Central Tendency	27	136	273	546	
Developmental - Mortality/ CNS effects (Tinston 1994)	31	High-End	13	64	128	256	30
		Central Tendency	38	192	384	769	

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**Table 4-73. Risk Estimation for Chronic, Cancer Dermal Exposures for Industrial Degreasing and Chemical Maskant Uses Which Are Not Closed Systems**

Endpoint, Tumor Types <sup>1</sup>	Dermal slope factor (risk per mg/kg/day)	Exposure Level	Cancer Risk Estimates				Benchmark
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
Cancer Risk liver tumors	2.0E-3	High-End	2.5E-3	5.0E-4	2.5E-4	1.2E-4	10 <sup>-4</sup>
		Central Tendency	6.4E-4	1.3E-4	6.4E-5	3.2E-5	

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<sup>1</sup> Based on route to route extrapolation from the oral slope factor using data from JISA (1993)

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#### 4.2.3.3 Aerosol Uses

For these uses, workers are likely to have direct dermal contact with film applied to substrate and incidental deposition of aerosol to skin. The exposure scenario is specific to aerosol degreasing and aerosol lubricants. EPA does not expect routine use of dermal PPE with this exposure scenario for commercial use.

**Table 4-74. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Aerosol Uses**

Endpoint <sup>1</sup>	Acute HED (mg/kg/day)	Exposure Level	MOEs for Acute Exposures				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5 <sup>3</sup>	Worker PF 10	Worker PF 20	
CNS - Visual effects (U.S. EPA 2012c)	4.3	High-End	0.8	4.0	8.0	16	10
		Central Tendency	2.4	12	24	48	

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<sup>1</sup> Based on route to route extrapolation from inhalation exposure data from Altmann et al. (1990) see Table 3-7

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**Table 4-75. Risk Estimation for Chronic, Non-Cancer Dermal Exposures for Aerosol Uses**

Endpoint	Chronic HED (mg/kg/day)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
CNS - Visual effects (U.S. EPA 2012c)	6.2	High-End	1.7	8.6	17	34	100
		Central Tendency	5.1	26	51	103	
Kidney - Histopathology (JISA 1993)	2.2	High-End	0.6	3.0	6.1	12	30
		Central Tendency	1.8	9.1	18	36	
Liver - Vessel dilation (JISA 1993)	24.5	High-End	6.8	34	68	135	30
		Central Tendency	20	101	203	406	
Reproductive - Sperm effects (Beliles et al. 1980)	22	High-End	6.1	30	61	121	30
		Central Tendency	18	91	182	364	
Developmental - Mortality/ CNS effects (Tinston 1994)	31	High-End	8.6	43	86	171	30
		Central Tendency	26	128	257	513	

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**Table 4-76. Risk Estimation for Chronic, Cancer Dermal Exposures for Aerosol Uses**

Endpoint, Tumor Types <sup>1</sup>	Dermal slope factor (risk per mg/kg/day)	Exposure Level	Cancer Risk Estimates				Benchmark
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
Cancer Risk liver tumors	2.0E-3	High-End	3.7E-3	7.4E-4	3.7E-4	1.9E-4	10 <sup>-4</sup>
		Central Tendency	9.6E-4	1.9E-4	9.6E-5	4.8E-5	

<sup>1</sup> Based on route to route extrapolation from the oral slope factor using data from JISA (1993)

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#### 4.2.3.4 Commercial Activities of Similar Maximum Concentration

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Most of these uses are uses with concentrations up to 100% PCE and occur at dry cleaners, and/or uses expected to have direct dermal contact with bulk liquids. At dry cleaning shops, workers may be exposed to bulk liquids while charging and draining solvent to/from machines, removing and disposing sludge, and maintaining equipment. Workers can also be exposed to PCE used in spot cleaning products at the same shop. The exposure scenarios include:

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- Dry Cleaning and Spot Cleaning
- Wipe Cleaning and Metal/Stone Polishes
- Other Spot Cleaning/Spot Remover
- Other Commercial Uses

EPA does not expect routine use of dermal PPE with these exposure scenarios for commercial use.

9415 **Table 4-77. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Commercial Activities**  
 9416 **of Similar Maximum Concentration**

Endpoint <sup>1</sup>	Acute HED (mg/kg/day)	Exposure Level	MOEs for Acute Exposures				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5 <sup>2</sup>	Worker PF 10 <sup>2</sup>	Worker PF 20 <sup>2</sup>	
CNS - Visual effects (U.S. EPA 2012c)	4.3	High-End	0.8	3.9	7.9	16	10
		Central Tendency	2.4	12	24	47	

9417 <sup>1</sup> Based on route to route extrapolation from inhalation exposure data from Altmann et al. (1990) see

9418 Table 3-7

9419 <sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario.

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9422 **Table 4-78. Risk Estimation for Chronic, Non-Cancer Dermal Exposures for Commercial**  
 9423 **Activities of Similar Maximum Concentration**

Endpoint	Chronic HED (mg/kg/day)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5 <sup>1</sup>	Worker PF 10 <sup>1</sup>	Worker PF 20 <sup>1</sup>	
CNS - Visual effects (U.S. EPA 2012c)	6.2	High-End	1.7	8.4	17	34	100
		Central Tendency	5.0	25	50	101	
Kidney - Histopathology (JISA 1993)	2.2	High-End	0.6	3.0	6.0	12	30
		Central Tendency	1.8	8.9	18	36	
Liver - Vessel dilation (JISA 1993)	24.5	High-End	6.6	33	66	133	300
		Central Tendency	20	99	199	398	
Reproductive - Sperm effects (Beliles et al. 1980)	22	High-End	6.0	30	60	119	30
		Central Tendency	18	89	179	357	
Developmental - Mortality/ CNS effects (Tinston 1994)	31	High-End	8.4	42	84	168	30
		Central Tendency	25	126	252	503	

9424 <sup>1</sup> EPA does not expect routine use of PPE with this exposure scenario.

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**Table 4-79. Risk Estimation for Chronic, Cancer Dermal Exposures for Commercial Activities of Similar Maximum Concentration**

Endpoint, Tumor Types <sup>1</sup>	Dermal slope factor (risk per mg/kg/day)	Exposure Level	Cancer Risk Estimates				Benchmark
			Worker No gloves	Worker PF 5 <sup>2</sup>	Worker PF 10 <sup>2</sup>	Worker PF 20 <sup>2</sup>	
Cancer Risk liver tumors	2.0E-3	High-End	3.8E-3	7.6E-4	3.8E-4	1.9E-4	10 <sup>-4</sup>
		Central Tendency	9.8E-4	2.0E-4	9.8E-5	4.9E-5	

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<sup>1</sup> Based on route to route extrapolation from the oral slope factor using data from JISA (1993)

<sup>2</sup> EPA does not expect routine use of PPE with this exposure scenario.

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#### 4.2.3.5 Metalworking Fluids

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These product formulations are expected to be used in industrial settings and workers may be exposed when unloading the metalworking fluid from containers; transferring fluids to the trough; and performing metal shaping operations. The exposure scenario is specific to metalworking fluids.

**Table 4-80. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Metalworking Fluids**

Endpoint <sup>1</sup>	Acute HED (mg/kg/day)	Exposure Level	MOEs for Acute Exposures				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
CNS - Visual effects (U.S. EPA 2012c)	4.3	High-End	12	60	120	241	10
		Central Tendency	36	181	361	722	

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<sup>1</sup> Based on route to route extrapolation from inhalation exposure data from Altmann et al. (1990) see

Table 3-7

**Table 4-81. Risk Estimation for Chronic, Non-Cancer Dermal Exposures for Metalworking Fluids**

Endpoint	Chronic HED (mg/kg/ day)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
CNS - Visual effects (U.S. EPA 2012c)	6.2	High-End	26	128	256	513	100
		Central Tendency	77	384	769	1,538	
Kidney - Histopathology (JISA 1993)	2.2	High-End	9.1	45	91	182	30
		Central Tendency	27	136	273	546	
Liver - Vessel dilation (JISA 1993)	24.5	High-End	101	506	1,013	2,026	30
		Central Tendency	304	1,519	3,039	6,077	
Reproductive - Sperm effects (Beliles et al. 1980)	22	High-End	91	455	910	1819	30
		Central Tendency	273	1364	2729	5457	
Developmental - Mortality/	31	High-End	128	641	1282	2563	30

Endpoint	Chronic HED (mg/kg/ day)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
CNS effects (Tinston 1994)		Central Tendency	384	1922	3845	7690	

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**Table 4-82. Risk Estimation for Chronic, Cancer Dermal Exposures for Metalworking Fluids**

Endpoint, Tumor Types <sup>1</sup>	Dermal slope factor (risk per mg/kg/day)	Exposure Level	Cancer Risk Estimates				Benchmark
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
Cancer Risk liver tumors	2.0E-3	High-End	2.5E-4	5.0E-5	2.5E-5	1.2E-5	10 <sup>-4</sup>
		Central Tendency	6.4E-5	1.3E-5	6.4E-6	3.2E-6	

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<sup>1</sup> Based on route to route extrapolation from the oral slope factor using data from JISA (1993)

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#### 4.2.3.6 Adhesives, Sealants, Paints, and Coatings

9445 These product formulations may have both industrial and commercial uses and workers may be exposed  
9446 when mixing coating/adhesive, charging products to application equipment (e.g., spray guns, roll  
9447 applicators, etc.), and cleaning application equipment. Other workers may also have incidental contact  
9448 with applied products during subsequent fabrication steps. The exposure scenario is specific to  
9449 adhesives, sealants, paints, and coatings.

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**Table 4-83. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Adhesives, Sealants, Paints, and Coatings**

Endpoint <sup>1</sup>	Acute HED (mg/kg/day)	Exposure Level	MOEs for Acute Exposures				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
<b>Commercial Uses</b>							
CNS - Visual effects (U.S. EPA 2012c)	4.3	High-End	1.0	4.9	9.8	20	10
		Central Tendency	3.0	15	30	59	
<b>Industrial Uses</b>							
CNS - Visual effects (U.S. EPA 2012c)	4.3	High-End	1.5	7.5	15	30	10
		Central Tendency	4.5	23	45	90	

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<sup>1</sup> Based on route to route extrapolation from inhalation exposure data from Altmann et al. (1990) see Table 3-7



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9457**Table 4-84. Risk Estimation for Chronic, Non-Cancer Dermal Exposures for Adhesives, Sealants, Paints, and Coatings**

Endpoint	Chronic HED (mg/kg/day)	Exposure Level	MOEs for Chronic Exposure				Benchmark MOE (= Total UF)
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
<b>Commercial Uses</b>							
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	6.2	High-End	2.1	10	21	42	100
		Central Tendency	6.3	31	63	126	
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.2	High-End	0.7	3.7	7.4	15	30
		Central Tendency	2.2	11	22	45	
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	24.5	High-End	8.3	41	83	166	30
		Central Tendency	25	124	248	497	
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	22	High-End	7.4	37	74	149	30
		Central Tendency	22	112	223	446	
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	31	High-End	10	52	105	210	30
		Central Tendency	31	157	314	629	
<b>Industrial Uses</b>							
CNS - Visual effects ( <a href="#">U.S. EPA 2012c</a> )	6.2	High-End	3.2	16	32	64	100
		Central Tendency	9.6	48	96	192	
Kidney - Histopathology ( <a href="#">JISA 1993</a> )	2.2	High-End	1.1	5.7	11	23	30
		Central Tendency	3.4	17	34	68	
Liver - Vessel dilation ( <a href="#">JISA 1993</a> )	24.5	High-End	13	63	127	253	30
		Central Tendency	38	190	380	760	
Reproductive - Sperm effects ( <a href="#">Beliles et al. 1980</a> )	22	High-End	11	57	114	227	30
		Central Tendency	34	171	341	682	
Developmental - Mortality/ CNS effects ( <a href="#">Tinston 1994</a> )	31	High-End	16	80	160	320	30
		Central Tendency	48	240	481	961	

9458

9459 **Table 4-85. Risk Estimation for Chronic, Cancer Dermal Exposures for Adhesives, Sealants,**  
 9460 **Paints, and Coatings**

Endpoint, Tumor Types <sup>1</sup>	Dermal slope factor (risk per mg/kg/day)	Exposure Level	Cancer Risk Estimates				Benchmark
			Worker No gloves	Worker PF 5	Worker PF 10	Worker PF 20	
<b>Commercial Uses</b>							
Cancer Risk liver tumors	2.0E-3	High-End	3.0E-3	6.1E-4	3.0E-4	1.5E-4	10 <sup>-4</sup>
		Central Tendency	7.8E-4	1.6E-4	7.8E-5	3.9E-5	
<b>Industrial Uses</b>							
Cancer Risk liver tumors	2.0E-3	High-End	2.0E-3	4.0E-4	2.0E-4	9.9E-5	10 <sup>-4</sup>
		Central Tendency	5.1E-4	1.0E-4	5.1E-5	2.6E-5	

<sup>1</sup> Based on route to route extrapolation from the oral slope factor using data from JISA (1993)

#### 9463 **4.2.4 Risk Estimation for Exposures to Consumers**

9464 Risk estimates for consumers were calculated for consumers for acute inhalation and dermal exposures.  
 9465 Risk estimates for chronic exposures were not calculated because it is unknown how the available  
 9466 toxicological data relates to the human exposures expected in consumer exposure scenarios. The toxicity  
 9467 studies are based on human worker studies or continuous subchronic-to-chronic repeated dose animal  
 9468 studies. In contrast, the consumer exposure scenarios are expected to be intermittent and it is unlikely  
 9469 that the expected use patterns would cumulatively be equivalent to these scenarios. It therefore cannot be  
 9470 ruled out whether there is any risk for chronic non-cancer or cancer associated with regular, intermittent  
 9471 exposures at the very high end of use frequency, however this scenario cannot be adequately evaluated  
 9472 and is unlikely to apply to the vast majority of users.

9473  
 9474 Risk estimates were presented for differing acute exposure assumptions, categorized as high, moderate,  
 9475 or low intensity users based on variation in weight fraction, mass of product used, and duration of  
 9476 use/exposure duration. Risk estimates primarily utilized central tendency values for other modeling  
 9477 parameters (e.g., room volume, air exchange rate, building volume) and therefore do not necessarily  
 9478 represent an upper bound of possible exposures. For more details on the characterization of consumer  
 9479 exposure see Section 2.4.2.2. For MOE estimates of all modeled scenarios see supplemental files: *Draft*  
 9480 *Risk Evaluation for Perchloroethylene Consumer Inhalation Risk Calculations* (U.S. EPA 2020c) and  
 9481 *Draft Risk Evaluation for Perchloroethylene Consumer Dermal Risk Calculations* (U.S. EPA 2020b).  
 9482 The HEC (Table 3-7) and HED values (Table 3-10) for neurotoxicity from (Altmann et al. 1990) was  
 9483 used for estimating of all acute consumer risks.  
 9484

##### 9485 **4.2.4.1 Aerosol Cleaners for Motors, Coils, Electrical Parts, Cables, Stainless Steel** 9486 **and marine Equipment, and Wire and Ignition Demoisurants**

9487 Estimates of MOEs for acute inhalation and dermal exposures for the aerosol cleaners for motors, coils  
 9488 and electrical parts, etc. consumer use are presented in Table 4-86 and Table 4-87, respectively.  
 9489 Consumer inhalation and dermal exposures were modeled across a range of low, moderate, and high  
 9490 user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity  
 9491 users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used  
 9492 respectively and minimum, midpoint, and maximum reported weight fractions where possible

9493 respectively. Characterization of low intensity, moderate intensity and high intensity users for dermal  
 9494 followed the same protocol as those described for the inhalation results, but only encompassing the two  
 9495 varied duration of use and weight fraction parameters. Inhalation exposures are presented for users and  
 9496 bystanders for 24-hour TWAs and dermal exposure results are presented for users as acute ADRs in  
 9497 Section 2.4.2.3.1.1.  
 9498

9499 Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the  
 9500 consumer inhalation estimate and medium for the dermal estimate, as discussed in Section 2.4.2.3.1.1.  
 9501

9502 **Table 4-86. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Aerosol Cleaners for**  
 9503 **Motors Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	7.7	39
Moderate Intensity User	0.2	0.8
High Intensity User	1.3E-02	5.2E-02

9504 <sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)  
 9505

9506 **Table 4-87. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Aerosol Cleaners for**  
 9507 **Motors Consumer Use**

Exposure Scenario	Consumer Receptor	User MOE
Low Intensity User	Adult (≥21 years)	35
	Youth (16-20 years)	38
	Youth (11-15 years)	35
Moderate Intensity User	Adult (≥21 years)	0.6
	Youth (16-20 years)	0.6
	Youth (11-15 years)	0.6
High Intensity User	Adult (≥21 years)	5.9E-02
	Youth (16-20 years)	6.3E-02
	Youth (11-15 years)	5.8E-02

9508 <sup>1</sup> HED extrapolated from inhalation exposures based on data from Altmann et al. (1990) described in Section 3.2.5.4.1  
 9509

9510 The MOEs are below the benchmark MOE for high and moderate intensity users and bystanders by  
 9511 inhalation and dermal exposures. The MOEs are below the benchmark MOE for the low intensity user  
 9512 by inhalation not dermal exposure and not for the low-intensity bystander.

#### 9513 4.2.4.2 Aerosol Brake Cleaners

9514 Estimates of MOEs for acute inhalation and dermal exposures for the aerosol brake cleaners consumer  
 9515 use are presented in Table 4-88 and Table 4-89, respectively. Consumer inhalation and dermal exposures  
 9516 were modeled across a range of low, moderate, and high user intensities as described in detail in Section  
 9517 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and  
 9518 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and

maximum reported weight fractions where possible respectively. Characterization of low intensity, moderate intensity and high intensity users for dermal followed the same protocol as those described for the inhalation results, but only encompassing the two varied duration of use and weight fraction parameters. Inhalation exposures are presented for users and bystanders for 24-hour TWAs and dermal exposure results are presented for users as acute ADRs in Section 2.4.2.3.1.2.

Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the consumer inhalation estimate and medium for the dermal estimate, as discussed in Section 2.4.2.3.1.2.

**Table 4-88. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Aerosol Brake Cleaners Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	2.0	7.1
Moderate Intensity User	0.2	0.8
High Intensity User	4.5E-02	0.2

<sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

**Table 4-89. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Aerosol Brake Cleaner Consumer Use**

Exposure Scenario	Consumer Receptor	Acute HED for CNS Effects <sup>1</sup> (4.25 mg/kg/day) Benchmark MOE = 10
		User MOE
Low Intensity User	Adult (≥21 years)	22
	Youth (16-20 years)	23
	Youth (11-15 years)	21
Moderate Intensity User	Adult (≥21 years)	0.6
	Youth (16-20 years)	0.7
	Youth (11-15 years)	0.6
High Intensity User	Adult (≥21 years)	7.2E-02
	Youth (16-20 years)	7.7E-02
	Youth (11-15 years)	7.1E-02

<sup>1</sup> HED extrapolated from inhalation exposures based on data from Altmann et al. (1990) described in Section 3.2.5.4.1

The MOEs are below the benchmark MOE for all users and bystanders by inhalation exposures. The MOEs are below the benchmark MOE for the high and Moderate Intensity Users by dermal exposure and not for low intensity dermal exposures.

#### 4.2.4.3 Parts Cleaners

Estimates of MOEs for acute inhalation and dermal exposures for the immersive parts cleaner consumer use are presented in Table 4-90 and Table 4-91, respectively. Consumer inhalation and dermal exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and

9544 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and  
 9545 maximum reported weight fractions where possible respectively. Characterization of low intensity,  
 9546 moderate intensity and high intensity users for dermal followed the same protocol as those described for  
 9547 the inhalation results, but only encompassing the two varied duration of use and weight fraction  
 9548 parameters. Inhalation exposures are presented for users and bystanders for 24-hour TWAs and dermal  
 9549 exposure results are presented for users as acute ADRs in Section 2.4.2.3.2.  
 9550

9551 Considering the overall strengths and limitations of the data, EPA's overall confidence is medium for the  
 9552 consumer inhalation estimate and medium for the dermal estimate, as discussed in Section 2.4.2.3.2.  
 9553

9554 **Table 4-90. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Parts Cleaners**  
 9555 **Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	31	174
Moderate Intensity User	<b>0.6</b>	<b>3.3</b>
High Intensity User	<b>7.1E-02</b>	<b>0.4</b>

9556 <sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)  
 9557

9558 **Table 4-91. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Parts Cleaners**  
 9559 **Consumer Use**

Exposure Scenario	Consumer Receptor	Acute HED for CNS Effects <sup>1</sup> (4.25 mg/kg/day) Benchmark MOE = 10
		User MOE
Low Intensity User	Adult (≥21 years)	<b>0.2</b>
	Youth (16-20 years)	<b>0.2</b>
	Youth (11-15 years)	<b>0.2</b>
Moderate Intensity User	Adult (≥21 years)	<b>1.4E-02</b>
	Youth (16-20 years)	<b>1.4E-02</b>
	Youth (11-15 years)	<b>1.3E-02</b>
High Intensity User	Adult (≥21 years)	<b>2.4E-03</b>
	Youth (16-20 years)	<b>2.3E-03</b>
	Youth (11-15 years)	<b>2.1E-03</b>

9560 <sup>1</sup> HED extrapolated from inhalation exposures based on data from Altmann et al. (1990) described in Section 3.2.5.4.1

9561 The MOEs are below the benchmark MOE for high and moderate intensity users and bystanders by  
 9562 inhalation exposures and not for low intensity inhalation exposures. The MOEs are below the  
 9563 benchmark MOE for all users by dermal exposure.  
 9564

9565 **4.2.4.4 Vandalism Stain Removers, Mold Cleaners, and Weld Splatter Protectants**

9566 Estimates of MOEs for acute inhalation exposures for the vandalism stain removers, mold cleaners, and  
 9567 weld splatter protectants consumer use are presented in Table 4-92. Dermal exposures to consumers are

not expected for vandalism stain removers, mold cleaners, and weld splatter protectants as described in Section 2.4.2.3.3. Consumer inhalation exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions where possible respectively. Inhalation exposures are presented for users and bystanders for 24-hour TWAs are presented in Section 2.4.2.3.3.

Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the consumer inhalation estimate, as discussed in Section 2.4.2.3.3.

**Table 4-92. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Vandalism Stain Removers, Mold Cleaners, and Weld Splatter Protectants Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	15	77
Moderate Intensity User	0.3	1.6
High Intensity User	1.3E-02	5.2E-02

<sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

The MOEs are below the benchmark MOE for high and moderate intensity users and bystanders by inhalation exposures and not for low intensity inhalation exposures.

#### 4.2.4.5 Marble Polish

Estimates of MOEs for acute inhalation and dermal exposures for the liquid-based marble polish consumer use are presented in Table 4-93 and Table 4-94, respectively. Consumer inhalation and dermal exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions where possible respectively. Characterization of low intensity, moderate intensity and high intensity users for dermal followed the same protocol as those described for the inhalation results, but only encompassing the two varied duration of use and weight fraction parameters. Inhalation exposures are presented for users and bystanders for 24-hour TWAs and dermal exposure results are presented for users as acute ADRs in Section 2.4.2.3.4.

Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the consumer inhalation estimate and medium for the dermal estimate, as discussed in Section 2.4.2.3.4.

**Table 4-93. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Liquid-Based Marble Polish Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	3.3	17

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Moderate Intensity User	6.8E-02	0.4
High Intensity User	1.2E-02	5.0E-02

<sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

**Table 4-94. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Liquid-Based Marble Polish Consumer Use**

Exposure Scenario	Consumer Receptor	Acute HED for CNS Effects <sup>1</sup> (4.25 mg/kg/day) Benchmark MOE = 10
		User MOE
Low Intensity User	Adult (≥21 years)	3.5
	Youth (16-20 years)	3.8
	Youth (11-15 years)	3.5
Moderate Intensity User	Adult (≥21 years)	5.5E-02
	Youth (16-20 years)	5.9E-02
	Youth (11-15 years)	5.4E-02
High Intensity User	Adult (≥21 years)	5.8E-03
	Youth (16-20 years)	6.3E-03
	Youth (11-15 years)	5.8E-03

<sup>1</sup> HED extrapolated from inhalation exposures based on data from Altmann et al. (1990) described in Section 3.2.5.4.1

The MOEs are below the benchmark MOE for high and Moderate Intensity Users and bystanders by inhalation exposures and not for low intensity inhalation exposures. The MOEs are below the benchmark MOE for all users by dermal exposures.

#### 4.2.4.6 Cutting Fluid

Estimates of MOEs for acute inhalation exposures for the cutting fluid consumer use are presented in Table 4-95. Dermal exposures for cutting fluid consumer use are not expected as described in Section 2.4.2.3.5. Consumer inhalation exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions where possible respectively. Inhalation exposures are presented for users and bystanders for 24-hour TWAs are presented in Section 2.4.2.3.5.

Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the consumer inhalation estimate, as discussed in Section 2.4.2.3.5.

**Table 4-95. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Cutting Fluid Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10
-------------------	--

	User MOE	Bystander MOE
Low Intensity User	8.1	39
Moderate Intensity User	1.3	6.7
High Intensity User	0.1	0.6

<sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

The MOEs are below the benchmark MOE for all users and high and moderate intensity bystanders by inhalation exposures and not for low intensity bystanders.

#### 4.2.4.7 Lubricants and Penetrating Oils

Estimates of MOEs for acute inhalation exposures for the lubricants and penetrating oils consumer use are presented in Table 4-96. Dermal exposures for the lubricants and penetrating oils consumer use are not expected as described in Section 2.4.2.3.6. Consumer inhalation exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions where possible respectively. Inhalation exposures are presented for users and bystanders for 24-hour TWAs are presented in Section 2.4.2.3.6

Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the consumer inhalation estimate, as discussed in Section 2.4.2.3.6.

**Table 4-96. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Lubricants and Penetrating Oils Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	90	435
Moderate Intensity User	1.4	7.3
High Intensity User	8.0E-02	0.4

<sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

The MOEs are below the benchmark MOE for high and moderate intensity users and bystanders by inhalation exposures and not for low intensity users and bystanders.

#### 4.2.4.8 Adhesives

Estimates of MOEs for acute inhalation exposures for the adhesives consumer use are presented in Table 4-97. Dermal exposures for the adhesives consumer use are not expected as described in Section 2.4.2.3.7. Consumer inhalation exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions where possible respectively. Inhalation exposures are presented for users and bystanders for 24-hour TWAs are presented in Section 2.4.2.3.7



9662 Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the  
 9663 consumer inhalation estimate, as discussed in Section 2.4.2.3.7.

9664 **Table 4-97. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Adhesives**  
 9665 **Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	62	299
Moderate Intensity User	2.3	12
High Intensity User	0.1	0.5

9667 <sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

9668  
 9669 The MOEs are below the benchmark MOE for high and moderate intensity users and high intensity  
 9670 bystanders by inhalation exposures and not for low intensity users and medium and low intensity  
 9671 bystanders.

#### 9672 4.2.4.9 Livestock Grooming Adhesive

9673 Estimates of MOEs for acute inhalation exposures for the livestock grooming adhesive consumer use are  
 9674 presented in Table 4-98. Dermal exposures for the livestock grooming adhesive consumer use are not  
 9675 expected as described in Section 2.4.2.3.8. Consumer inhalation exposures were modeled across a range  
 9676 of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low,  
 9677 moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use  
 9678 and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions  
 9679 where possible respectively. Inhalation exposures are presented for users and bystanders for 24-hour  
 9680 TWAs are presented in Section 2.4.2.3.8

9682 Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the  
 9683 consumer inhalation estimate, as discussed in Section 2.4.2.3.8.

9684 **Table 4-98. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Livestock Grooming**  
 9685 **Adhesives Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	112	539
Moderate Intensity User	12	64
High Intensity User	0.8	3.0

9686 <sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

9687  
 9688 The MOEs are below the benchmark MOE for high intensity users and bystanders by inhalation  
 9689 exposures and not for medium and low intensity users and bystanders.

#### 9690 4.2.4.10 Caulks, Sealants and Column Adhesives

9691 Estimates of MOEs for acute inhalation exposures for the caulks, sealants and column adhesives  
 9692 consumer use are presented in Table 4-99. Dermal exposures for the caulks, sealants and column  
 9693 adhesives consumer use are not expected and the area of use was assumed to be outdoors, so bystander

9694 exposure was not estimated (see Section 2.4.2.3.9). Consumer inhalation exposures were modeled across  
 9695 a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For  
 9696 inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile  
 9697 duration of use and mass of product used respectively and minimum, midpoint, and maximum reported  
 9698 weight fractions where possible respectively. Inhalation exposures are presented for users and  
 9699 bystanders for 24-hour TWAs are presented in Section 2.4.2.3.9.

9701 Considering the overall strengths and limitations of the data, EPA's overall confidence is medium for the  
 9702 consumer inhalation estimate, as discussed in Section 2.4.2.3.9.

9703 **Table 4-99. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Caulks, Sealants and**  
 9704 **Column Adhesives Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10
	User MOE
Low Intensity User	192
Moderate Intensity User	2.3
High Intensity User	7.2E-02

9706 <sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

9707 The MOEs are below the benchmark MOE for high and moderate intensity users by inhalation  
 9708 exposures and now for low intensity users.

9711 **4.2.4.11 Outdoor Water Shield**

9712 Estimates of MOEs for acute inhalation and dermal exposures for the outdoor water shield consumer use  
 9713 are presented in Table 4-100 and Table 4-101, respectively. Consumer inhalation and dermal exposures  
 9714 were modeled across a range of low, moderate, and high user intensities as described in detail in Section  
 9715 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and  
 9716 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and  
 9717 maximum reported weight fractions where possible respectively. Characterization of low intensity,  
 9718 moderate intensity and high intensity users for dermal followed the same protocol as those described for  
 9719 the inhalation results, but only encompassing the two varied duration of use and weight fraction  
 9720 parameters. Inhalation exposures are presented for users and bystanders for 24-hour TWAs and dermal  
 9721 exposure results are presented for users as acute ADRs in Section 2.4.2.3.10.

9723 Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the  
 9724 consumer inhalation estimate and medium for the dermal estimate, as discussed in Section 2.4.2.3.4  
 9725 2.4.2.3.10.

9726 **Table 4-100. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Outdoor Water**  
 9727 **Shield Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE

Low Intensity User	7.6	29
Moderate Intensity User	1.1	3.3
High Intensity User	8.9E-02	0.4

<sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

**Table 4-101. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Outdoor Water Shield Consumer Use**

Exposure Scenario	Consumer Receptor	Acute HED for CNS Effects <sup>1</sup> (4.25 mg/kg/day) Benchmark MOE = 10
		User MOE
Low Intensity User	Adult (≥21 years)	0.1
	Youth (16-20 years)	0.1
	Youth (11-15 years)	0.1
Moderate Intensity User	Adult (≥21 years)	2.6E-02
	Youth (16-20 years)	2.8E-02
	Youth (11-15 years)	2.5E-02
High Intensity User	Adult (≥21 years)	5.2E-03
	Youth (16-20 years)	5.5E-03
	Youth (11-15 years)	5.0E-03

<sup>1</sup> HED extrapolated from inhalation exposures based on data from Altmann et al. (1990) described in Section 3.2.5.4.1

The MOEs are below the benchmark MOE for all users and high and moderate intensity bystanders by inhalation exposures and not for low intensity bystanders. The MOEs are below the benchmark MOE for all users by dermal exposures.

#### 4.2.4.12 Aerosol Coatings and Primers

Estimates of MOEs for acute inhalation exposures for the aerosol coatings and primers consumer use are presented in Table 4-102. Dermal exposures for the aerosol coatings and primers consumer use are not expected as described in Section 2.4.2.3.11. Consumer inhalation exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions where possible respectively. Inhalation exposures are presented for users and bystanders for 24-hour TWAs are presented in Section 2.4.2.3.11.2.4.2.3.92.4.2.3.8.

Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the consumer inhalation estimate, as discussed in Section 2.4.2.3.11.

**Table 4-102. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Aerosol Coatings and Primers Consumer Use**

Exposure Scenario	Acute HED for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE

Low Intensity User	522	13448
Moderate Intensity User	62	2143
High Intensity User	<b>5.9</b>	209

<sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

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The MOEs are below the benchmark MOE for high intensity users by inhalation exposures. The MOEs are above the benchmark MOE for medium and low intensity users and all bystanders by inhalation exposures.

#### 4.2.4.13 Liquid Primers and Sealants

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Estimates of MOEs for acute inhalation and dermal exposures for the liquid primers and sealants consumer use are presented in Table 4-103 and Table 4-104, respectively. Consumer inhalation and dermal exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions where possible respectively. Characterization of low intensity, moderate intensity and high intensity users for dermal followed the same protocol as those described for the inhalation results, but only encompassing the two varied duration of use and weight fraction parameters. Inhalation exposures are presented for users and bystanders for 24-hour TWAs and dermal exposure results are presented for users as acute ADRs in Section 2.4.2.3.12.

Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the consumer inhalation estimate and medium for the dermal estimate, as discussed in Section 2.4.2.3.12.

**Table 4-103. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Liquid Primers and Sealants Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	10600	128556
Moderate Intensity User	1163	12434
High Intensity User	36	229

<sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

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9780

**Table 4-104. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Liquid Primers and Sealants Consumer Use**

Exposure Scenario	Consumer Receptor	Acute HED for CNS Effects <sup>1</sup> (4.25 mg/kg/day) Benchmark MOE = 10
		User MOE
Low Intensity User	Adult (≥21 years)	<b>1.4</b>
	Youth (16-20 years)	<b>1.5</b>
	Youth (11-15 years)	<b>1.4</b>
Moderate Intensity User	Adult (≥21 years)	<b>1.8E-02</b>

	Youth (16-20 years)	1.9E-02
	Youth (11-15 years)	1.8E-02
High Intensity User	Adult (≥21 years)	1.6E-02
	Youth (16-20 years)	1.7E-02
	Youth (11-15 years)	1.6E-02

<sup>1</sup> HED extrapolated from inhalation exposures based on data from Altmann et al. (1990) described in Section 3.2.5.4.1

The MOEs are above the benchmark MOE for all users and bystanders by inhalation exposures. The MOEs are below the benchmark MOE for all users by dermal exposures.

#### 4.2.4.14 Metallic Overglaze

Estimates of MOEs for acute inhalation exposures for the metallic overglaze consumer use are presented in Table 4-105. Dermal exposures for the caulks, sealants and column adhesives consumer use are not expected as described in Section 2.4.2.3.13. Consumer inhalation exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions where possible respectively. Inhalation exposures are presented for users and bystanders for 24-hour TWAs are presented in Section 2.4.2.3.13.

Considering the overall strengths and limitations of the data, EPA's overall confidence is medium for the consumer inhalation estimate, as discussed in Section 2.4.2.3.13.

**Table 4-105. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Metallic Overglaze Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	4372	21107
Moderate Intensity User	337	1674
High Intensity User	21	81

<sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

The MOEs are above the benchmark MOE for all users and bystanders by inhalation exposures.

#### 4.2.4.15 Metal and Stone Polish

Estimates of MOEs for acute inhalation and dermal exposures for the liquid wax-based metal and stone polish consumer use are presented in Table 4-106 and Table 4-107, respectively. Consumer inhalation and dermal exposures were modeled across a range of low, moderate, and high user intensities as described in detail in Section 2.4.2.2. For inhalation, low, moderate and high intensity users are characterized by the 10<sup>th</sup>, 50<sup>th</sup>, and 95<sup>th</sup> percentile duration of use and mass of product used respectively and minimum, midpoint, and maximum reported weight fractions where possible respectively. Characterization of low intensity, moderate intensity and high intensity users for dermal followed the same protocol as those described for the inhalation results, but only encompassing the two varied

9814 duration of use and weight fraction parameters. Inhalation exposures are presented for users and  
 9815 bystanders for 24-hour TWAs and dermal exposure results are presented for users as acute ADRs in  
 9816 Section 2.4.2.3.14.

9818 Considering the overall strengths and limitations of the data, EPA's overall confidence is high for the  
 9819 consumer inhalation estimate and medium for the dermal estimate, as discussed in Section 2.4.2.3.14.  
 9820

9821 **Table 4-106. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Metal and Stone**  
 9822 **Polish Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User MOE	Bystander MOE
Low Intensity User	1.1	5.3
Moderate Intensity User	0.2	0.8
High Intensity User	1.5E-02	6.1E-02

9823 <sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

9824 **Table 4-107. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Metal and Stone**  
 9825 **Polish Consumer Use**

Exposure Scenario	Consumer Receptor	Acute HED for CNS Effects <sup>1</sup> (4.25 mg/kg/day) Benchmark MOE = 10
		User MOE
Low Intensity User	Adult (≥21 years)	1.0
	Youth (16-20 years)	1.0
	Youth (11-15 years)	1.0
Moderate Intensity User	Adult (≥21 years)	0.1
	Youth (16-20 years)	0.1
	Youth (11-15 years)	0.1
High Intensity User	Adult (≥21 years)	1.4E-02
	Youth (16-20 years)	1.5E-02
	Youth (11-15 years)	1.3E-02

9827 <sup>1</sup> HED extrapolated from inhalation exposures based on data from Altmann et al. (1990) described in Section 3.2.5.4.1

9828  
 9829 The MOEs are below the benchmark MOE for all users and bystanders by inhalation and dermal  
 9830 exposures.  
 9831

9832 **4.2.4.16 Dry Cleaned Clothing**

9833 Estimates of MOEs for acute inhalation and dermal exposures for the dry cleaned clothing consumer use  
 9834 are presented in Table 4-108 and Table 4-109, respectively. Consumer inhalation and dermal exposures  
 9835 were modeled as described in Section 2.4.2.4. Inhalation exposures are presented for users and  
 9836 bystanders for 24-hour TWAs in Section 2.4.2.4.3 and dermal exposure results are presented for users as  
 9837 acute ADRs in Section 2.4.2.4.2.  
 9838

9839 Considering the overall strengths and limitations of the data, EPA's overall confidence is medium to  
 9840 high for the consumer inhalation estimate and medium to high for the dermal estimate, as discussed in  
 9841 Section 2.4.2.4.2.

9842  
 9843 **Table 4-108. Risk Estimation for Acute, Non-Cancer Inhalation Exposures for Dry Cleaned**  
 9844 **Clothing Consumer Use**

Exposure Scenario	Acute HEC for CNS Effects <sup>1</sup> (11 mg/m <sup>3</sup> ) Benchmark MOE = 10	
	User (Adult) MOE	Bystander (Youth or Child) MOE
Stay-at-home Adult and Child	156	486

9845 <sup>1</sup> 24 hrs HEC based on data from Altmann et al. (1990)

9846  
 9847 **Table 4-109. Risk Estimation for Acute, Non-Cancer Dermal Exposures for Dry Cleaned Clothing**  
 9848 **Consumer Use**

Acute HED for CNS Effects <sup>1</sup> (4.25 mg/kg/day) Benchmark MOE = 10				
Assumed dry cleaning technology	Dry Cleaning Events	Days After Dry Cleaning	User, Half-Body MOE	User, Full-Body MOE
2 <sup>nd</sup> and 3 <sup>rd</sup> generation	Single	1	8.6	2.9
		2	11	3.7
		3	15	4.9
4 <sup>th</sup> and 5 <sup>th</sup> generation	Single	1	49	16
		2	64	21
		3	83	28
4 <sup>th</sup> and 5 <sup>th</sup> generation	Repeat <sup>2</sup>	1	16	5.2
		2	20	6.7
		3	26	8.7

9849 <sup>1</sup> HED extrapolated from inhalation exposures based on data from Altmann et al. (1990) described in Section 3.2.5.4.1

9850 <sup>2</sup> Based on maximum average PCE concentration in wool after 6 dry cleaning cycles from Sherlach (2011); PCE  
 9851 concentration was still increasing in wool fabric after 6 cycles and had not yet reached saturation.

9852  
 9853 The MOEs are above the benchmark MOE for stay-at-home adults and children by inhalation. The  
 9854 MOEs are above the benchmark MOE for users exposed to half-body garments one day after dry  
 9855 cleaning, and full-body garments one to three days after dry cleaning for 2<sup>nd</sup> and 3<sup>rd</sup> generation dry  
 9856 cleaning technologies, and below the benchmark MOE for users exposed to half-body garments two and  
 9857 three days after dry cleaning for 2<sup>nd</sup> and 3<sup>rd</sup> generation dry cleaning technologies. The MOEs are above  
 9858 benchmark MOE for users exposed to full-body garments one to three days after multiple dry cleaning  
 9859 cycles for 4<sup>th</sup> and 5<sup>th</sup> generation dry cleaning technologies, and below the benchmark MOE for users  
 9860 exposed to half- and full-body garments, one to three days after dry cleaning, for single event and  
 9861 multiple dry cleaning cycles, for 4<sup>th</sup> and 5<sup>th</sup> generation dry cleaning technologies.

### 4.3 Assumptions and Key Sources of Uncertainty for Risk Characterization

#### 4.3.1 Environmental Risk Characterization Assumptions and Key Sources of Uncertainty

PCE is toxic to aquatic organisms. The EPA has determined that data are sufficient to characterize the environmental hazards of PCE and that the exposure pathways to the terrestrial environment are not likely. The following uncertainties are associated with the hazard characterization. Assessment factors (AFs) were used to calculate the acute and chronic COC for PCE. As described in Section 3.1.4, AFs address the inter- and intra-species variability, as well as laboratory-to-field variability and are routinely used within TSCA for assessing chemical hazards with limited environmental data. Additionally, AFs account for potential data gaps in the literature in which data for more sensitive species were not available. Use of AFs increases the confidence that the hazard characterizations were not underestimated, resulting in false negative conclusions. Although the toxicity values for fish, and invertebrates are relatively consistent, algae species tend to vary widely in their sensitivity to chemical pollutants. Data were only available for three algal species and may not represent the most sensitive species at a given site. Additionally, there were no PCE toxicity data available for amphibians.

#### *Measured Surface Water Data and Watershed Analysis*

The physical properties of PCE can lead to monitoring data showing limited occurrence in surface water. PCE in surface waters can be expected to volatilize into the atmosphere. However, PCE is denser than water and only slightly soluble in water. In soil and aquifers, it will tend to remain in the aqueous phase and be transported to ground water.

WQX surface water monitoring data for the following years of 2013-2017 showed that PCE occurrence was relatively low. For the 2016 data, only 4 monitoring sites had PCE concentrations above the monitoring detection limit. The concentrations ranged from 1.4E-2 to 5.2E-2 µg/L, which are below the lowest COC of 1.4 µg/L that is used in the ecological assessment.

When evaluating surface water monitoring data, it must be noted that EPA only looked at surface water data that excluded other major sources of water data, e.g., drinking water, superfund sites, and ground water. The quality of the data provided in the USGS-NWIS and STORET datasets varies, and some of the information provided is non-quantitative. While a large number of individual sampling results were obtained from these datasets, the monitoring studies used to collect the data were not specifically designed to evaluate PCE distribution across the U.S. As a result, there are uncertainties in the reported data that are difficult to quantify with regard to impacts on exposure estimates.

The available data represent a variety of discrete locations and time periods; therefore, it is unclear whether the data are representative of other locations in the U.S.; however, this limitation does not diminish the overall findings reported in this assessment, as the exposure data show very few instances (*i.e.*, less than 0.01 percent) where measured PCE levels in the ambient environment exceeded the identified hazard benchmarks for aquatic organisms.

The surface water monitoring results were further validated through data acquired via EPA's systematic review of surface water literature and biomonitoring data. Minimum results came from the systematic review on PCE in surface water. Data from three U.S. studies indicated that PCE occurrence and related concentrations in surface water were relatively low as well. The reported concentrations of PCE ranged from below the detection limit and reported central tendency values ranging from <0.2 to 0.7 µg/L which is below the lowest COC of 1.4 µg/L. The systematic review of biomonitoring data yielded three



9907 viable studies that contained PCE concentration measurements in blood. These studies did indicate that  
9908 PCE was detected moderately (37-60%) in samples evaluated. However, the concentration of PCE was  
9909 not higher than the detection limits of the respective studies.  
9910

#### 9911 ***Modeled Surface Water Concentrations***

9912 To further evaluate PCE exposure in surface water EPA modeled indirect and direct releases of PCE in  
9913 surface water by facilities. EPA modeled releasing facilities plus one industry with sites nationwide that  
9914 was obtained by three data sources (TRI, DMRs, and CDR) for the 2016 calendar year.

9915 The modeled estimations of PCE releases and surface water monitoring data were merged and mapped  
9916 to reflect where PCE occurrence and related concentrations are with respect to each other in the U.S.  
9917 The maps show that there is minimum PCE exposure at the respective COC in regard to environmental  
9918 exposure assessment for aquatic species. The co-location of PCE releasing facilities and surface water  
9919 monitoring stations in an HUC were also mapped via geospatial analysis to illustrate both measured and  
9920 predicted concentrations PCE. The maps indicate that even though there are estimated releases from  
9921 facilities, some of which have concentrations higher than the COC, the data from monitoring stations are  
9922 not detecting PCE within the same HUC. It must be noted that the use geospatial analysis has a  
9923 limitation with the accuracy of the latitudes and longitudes therefore affecting placement of facilities and  
9924 monitoring stations.

### 9925 **4.3.2 Human Health Risk Characterization Key Assumptions and Uncertainties**

#### 9926 **4.3.2.1 Human Health Hazard Considerations**

9927 There is medium-high confidence in the acute non-cancer POD, high confidence in the chronic non-  
9928 cancer PODs selected to represent each health domain, and medium confidence in the cancer POD.  
9929 Confidence is reduced for dermal PODs due to the use of route-to-route extrapolation in the absence of a  
9930 dermal compartment in the PBPK model (Section 3.2.6.4). Major uncertainties include the selection of  
9931 cancer endpoint for IUR selection and inconclusive human evidence for a few health domains.

#### 9932 **4.3.2.2 Occupational Risk Considerations**

9933 EPA estimated inhalation risk to workers and ONUs based on monitoring and/or modeling data, as  
9934 reasonably available. For the majority of OES, only one source was available so the results could not be  
9935 compared. Despite the absence of both types of data for most OES, overall confidence in worker  
9936 inhalation estimates ranged from Medium to High for all OES (Table 2-15). For ONUs, modeling or  
9937 monitoring data was available in 9 of 22 OES. For the other 13, in the absence of reasonably available  
9938 data EPA applied the worker central tendency estimates to ONUs. When ONU data was not available,  
9939 there is low confidence in ONU risk estimates. There is medium confidence in dermal exposure  
9940 estimates, which are based on the *Dermal Exposure to Volatile Liquids Model* (Section 2.4.1.29).  
9941

9942 There are significant uncertainties associated with PPE usage across OES. For the majority of OES,  
9943 EPA assumes that workers will responsibly wear gloves and respirators and that employers implement a  
9944 continuing, effective respiratory protection program according to the requirements of OSHA's  
9945 Respiratory Protection Standard. This results in respiratory protection up to APF = 50 and glove  
9946 protection up to PF = 20 (or PF = 10 for commercial scenarios). Respiratory protection factors can be  
9947 confirmed through regular fit testing, however glove PFs represent a what-if scenario and EPA cannot  
9948 confirm the actual frequency, type, and effectiveness of globe use in specific workplaces with PCE  
9949 conditions of use. Risks may be underestimated by these assumptions. EPA also identified OES for

9950 which regular respirator use is not expected (Table 4-8), and risks may be overestimated for these  
9951 scenarios if even mild respiratory protection is employed.

### 9952 **4.3.2.3 Consumer Risk Considerations**

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9953 There is medium to high or high confidence in both the consumer inhalation and dermal exposure  
9954 estimates (Section 2.4.2.6). All exposure estimates are based on modeling, and there is uncertainty based  
9955 on the application of surrogate product categories from the Westat survey ([Westat 1987](#)) when there was  
9956 not an exact match for the COU. Professional judgement was also required for determining the most  
9957 appropriate room of use, which affects the area volume and in turn inhalation exposure estimates. A key  
9958 uncertainty for the dermal estimates is the accuracy of the assumption of which COUs are likely to result  
9959 in exposure with impeded evaporation, and whether evaporation is truly fully impeded for those  
9960 scenarios.

9961 EPA only evaluated acute risks for consumer COUs. While the expected sparse and intermittent use  
9962 frequency for the vast majority of users indicates that only acute risks are relevant to consumer uses,  
9963 there is uncertainty whether chronic risks may be of concern for consumers at the very high end of the  
9964 range for frequency of use, especially if a product is used several days consecutively. Without continued  
9965 consecutive use, chronic hazards are unlikely due to the relatively short half life of TCE (Section  
9966 3.2.2.1.3).  
9967

## 9968 **4.4 Other Risk Related Considerations**

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### 9969 **4.4.1 Potentially Exposed or Susceptible Subpopulations**

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9970 TSCA requires that the determination of whether a chemical substance presents an unreasonable risk  
9971 include consideration of unreasonable risk to “a potentially exposed or susceptible subpopulation  
9972 identified as relevant to the risk evaluation” by EPA. TSCA § 3(12) states that “the term ‘potentially  
9973 exposed or susceptible subpopulation’ means a group of individuals within the general population  
9974 identified by the Administrator who, due to either greater susceptibility or greater exposure, may be at  
9975 greater risk than the general population of adverse health effects from exposure to a chemical substance  
9976 or mixture, such as infants, children, pregnant women, workers, or the elderly.”

9977 EPA identified workers, ONUs, consumers, and bystanders as potentially exposed populations. EPA  
9978 provided risk estimates for workers and ONUs at both central tendency and high-end exposure levels for  
9979 all COUs. Consumer and bystander risk estimates were provided for low, medium, and high intensities  
9980 of use, accounting for differences in duration, weight fraction, and mass used. Occupational dermal risk  
9981 estimates were calculated for both average workers and women of childbearing age (see *Draft Risk  
9982 Evaluation for Perchloroethylene Supplemental File: Occupational Exposure Risk Calculator* ([U.S.  
9983 EPA 2020e](#))) and consumer dermal risk estimates were calculated for both adult and children (see *Draft  
9984 Risk Evaluation for Perchloroethylene Consumer Dermal Risk Calculations* ([U.S. EPA 2020b](#))). EPA  
9985 determined that bystanders may include lifestages of any age. These groups exhibit differences in  
9986 delivered dose accounting for differing body weight and hand size, accounting for differences in  
9987 exposure, and providing risk estimates for women of childbearing age protects the susceptible  
9988 subpopulation of the developing fetus.  
9989

9990 For inhalation exposures, risk estimates did not differ between sexes or across lifestages because both  
9991 exposures and inhalation hazard values are expressed as an air concentration. EPA expects that  
9992 variability in human physiological factors (e.g., breathing rate, body weight, tidal volume) which may  
9993 affect internal delivered concentration or dose is sufficiently accounted for through the use of a 10x UF

9994 for human intraspecies variability, although some differences among lifestages or between working and  
9995 at-rest individuals may not have been accounted for by this value. EPA identified lifestage, biological  
9996 sex, genetic polymorphisms, race/ethnicity, preexisting health status, and lifestyle factors and nutrition  
9997 status as factors affecting biological susceptibility. Similarly, most but not all of these factors are  
9998 expected to be covered by the inclusion of a 10x UF<sub>H</sub>.  
9999

10000 EPA was unable to directly account for all possible PESS considerations and subpopulations in the risk  
10001 estimates. It is unknown whether the 10x UF to account for human variability will cover the full breadth  
10002 of human responses, and subpopulations with particular disease states or genetic predispositions may fall  
10003 outside of the range covered by this UF. As previously discussed, EPA also only considered acute  
10004 effects from consumer exposure. While typical use patterns are unlikely to result in any chronic effects  
10005 for the vast majority of consumers, EPA cannot rule out that consumers at very high frequencies of use  
10006 may be at risk for chronic hazards, especially if those consumers also exhibit biological susceptibilities.  
10007 EPA can also not rule out that certain subpopulations, whether due to very elevated exposure or  
10008 biological susceptibility, may be at risk for hazards that were not fully supported by the weight of  
10009 evidence or could not be quantified (e.g. immune and blood effects). However, in these circumstances  
10010 EPA assumes that these effects are likely to occur at a higher dose than more sensitive endpoints that  
10011 were accounted for by risk estimates.

#### 10012 **4.4.2 Aggregate and Sentinel Exposures**

---

10013 Section 2605(b)(4)(F)(ii) of TSCA requires the EPA, as a part of the risk evaluation, to describe whether  
10014 aggregate or sentinel exposures under the conditions of use were considered and the basis for their  
10015 consideration. The EPA has defined aggregate exposure as “the combined exposures to an individual  
10016 from a single chemical substance across multiple routes and across multiple pathways. Due to deference  
10017 to existing environmental statutes, administered by EPA, a detailed analysis of environmental pathways  
10018 to the general population was not deemed appropriate for this risk evaluation.  
10019

10020 The EPA defines sentinel exposure as “the exposure to a single chemical substance that represents the  
10021 plausible upper bound of exposure relative to all other exposures within a broad category of similar or  
10022 related exposures.” In terms of this risk evaluation, the EPA considered sentinel exposure in the form of  
10023 a high-end screening level scenario for occupational exposure resulting from dermal and inhalation  
10024 exposures, as these exposure routes are the most likely to result in the highest exposure given the details  
10025 of the manufacturing process and the potential exposure scenarios discussed above. The calculation for  
10026 dermal exposure is especially conservative given that it assumes full contact/immersion.

### 10027 **4.5 Risk Conclusions**

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#### 10028 **4.5.1 Environmental Risk Conclusions**

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##### 10029 **Aquatic Pathways**

10030 Table 4-110 displays risk quotients for each of the facilities by COU. No risks were identified for  
10031 aquatic organisms from PCE release to surface water from the Maskants for Chemical Milling, Dry  
10032 Cleaning (Industrial and Commercial), Other Industrial, and Other Commercial Uses COUs. *Based on*  
10033 *the data quality, uncertainties and weight of scientific evidence, confidence in the risk estimate is*  
10034 *medium.*  
10035

10036 Risks from acute PCE exposures were identified for aquatic organisms based on indirect releases from  
10037 the Incorporation into Formulations COU. *Therefore, EPA concludes there is an acute risk to aquatic*

10038 *organisms from release of PCE to surface water from facilities using PCE from the Incorporation into*  
10039 *Formulations COU. Based on the data quality, uncertainties and weight of scientific evidence,*  
10040 *confidence in the risk estimate is medium.*

10041  
10042 Risks from chronic PCE exposures were identified for aquatic organisms based on direct releases from  
10043 the Processing as a Reactant COU, and indirect releases from Incorporation into Formulations COU.  
10044 *Therefore, EPA concludes there is a chronic risk to aquatic organisms from release of PCE to surface*  
10045 *water from facilities using PCE for the COUs listed above. Based on the data quality, uncertainties and*  
10046 *weight of scientific evidence, confidence in the risk estimate is medium.*

10047  
10048 Risks from PCE exposures were identified for algae based on direct releases from the following COUs:  
10049 Manufacturing; Processing as a Reactant; Open-Top Vapor Degreasing; and Industrial Processing Aid.  
10050 In addition, indirect release (80% removal) from Manufacturing, Importing/Repackaging, Industrial  
10051 Processing Aid; Incorporation into Formulations; and Waste Handling, Disposal, Treatment, and  
10052 Recycling COUs resulted in risks to algae from PCE exposure. *Therefore, EPA concludes there is a risk*  
10053 *to algae from release of PCE to surface water from facilities using PCE for the COUs listed above.*  
10054 *Based on the data quality, uncertainties and weight of scientific evidence, confidence in the risk estimate*  
10055 *is medium.*

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10057

**Table 4-110. Modeled Facilities Showing RQs and Days of Exceedance from the Release of PCE to Surface Water as Modeled in E-FAST.** Acute risk = RQs  $\geq 1$ , chronic and algae risk = RQs  $\geq 1$  and  $\geq 20$  days of exceedance. Shaded areas show risk.

Name, Location, and ID of Active Releaser Facility <sup>a</sup>	Release Media <sup>b</sup>	Modeled Facility or Industry Sector in E-FAST <sup>c</sup>	EFAST Waterbody Type <sup>d</sup>	Days of Release <sup>e</sup>	Release (kg/day) <sup>f</sup>	WWT removal %	7Q10 SWC (ppb) <sup>g</sup>	COC Type	COC (ppb)	Days of Exceedance (days/year) <sup>h</sup>	Risk Quotient
<b>OES: Manufacturing</b>											
Axiall Corporation Westlake, LA NPDES: LA0000761	Surface Water or POTW	Direct (0% WWT removal): LA0000761	Surface Water	350	0.1 (max)	0	0.1	Acute	1,342	0	8.2E-5
								Chronic	50	0	2.2E-3
								Algae	1.4	0	7.9E-2
				80	2.3E-2	Acute	1,342	0	1.7E-5		
						Chronic	50	0	4.5E-5		
						Algae	1.4	0	1.6E-2		
		350	3.0E-2 (avg)	0	3.4E-2	Acute	1,342	0	2.5E-5		
						Chronic	50	0	6.8E-4		
						Algae	1.4	0	2.4E-2		
				80	1.1	Acute	1,342	0	8.2E-4		
						Chronic	50	0	2.2E-2		
						Algae	1.4	0	0.8		
		20	0.5	0	0.6	Acute	1,342	0	4.6E-4		
						Chronic	50	0	1.2E-2		
						Algae	1.4	0	0.4		
Greenchem West Palm Beach, FL NPDES: None (FRS 110056959634)	Surface Water or POTW	Direct and Indirect Surrogate: Organic Chemicals Mfg	Surface Water	350	0.1 (max)	0	18	Acute	1,342	0	1.4E-2
								Chronic	50	25	0.4
								Algae	1.4	189	13
				80	3.7	Acute	1,342	0	2.8E-3		
						Chronic	50	7	7.5E-2		
						Algae	1.4	77	2.7		
				350	3.0E-2 (avg)	0	5.6	Acute	1,342	0	4.1E-3
								Chronic	50	11	0.1
								Algae	1.4	100	4.0
		80	1.1			Acute	1,342	0	8.3E-04		
						Chronic	50	1	2.2E-2		
						Algae	1.4	37	0.8		
		20	0.5	0	100	Acute	1,342	0	7.4E-2		
						Chronic	50	4	2.0		
						Algae	1.4	17	71		
Occidental Chemical Corp	Surface Water	LA0002933	Surface Water	350	2.0E-3	0	8.1E-6	Acute	1,342	0	6.0E-9
								Chronic	50	0	1.6E-7

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Geismar Plant Geismar, LA NPDES: LA0002933				20	3.0E-2	0	1.2E-4	Algae	1.4	0	5.8E-6
								Acute	1,342	0	9.0E-8
								Chronic	50	0	2.4E-6
								Algae	1.4	0	8.6E-5
Olin Blue Cube Freeport, TX NPDES: None (FRS 110066943605)	Non- POTW WWT	Receiving Facility: TX0006483	Surface Water	350	4.0E-2	80	3.1E-3	Acute	1,342	0	2.3E-6
								Chronic	50	0	2.3E-6
								Algae	1.4	0	6.1E-5
				20	0.7	80	5.6E-2	Acute	1,342	0	2.2E-3
								Chronic	50	0	1.1E-3
								Algae	1.4	0	4.2E-5
Solvents & Chemicals Pearland, TX NPDES: Not available (TRI: 77588SLVNT470 4S)	Surface Water or POTW	Direct and Indirect Surrogate: Organic Chemicals Mfg	Surface Water	350	3.0E-4 (max)	0	5.6E-2	Acute	1,342	0	1.1E-3
								Chronic	50	0	4.0E-2
								Algae	1.4	2	4.0E-2
				80	1.1E-3	Acute	1,342	0	4.1E-5		
						Chronic	50	0	1.1E-3		
						Algae	1.4	0	4.0E-2		
		350	1.0E-4 (avg)	0	1.9E-2	Acute	1,342	0	8.3E-7		
						Chronic	50	0	2.2E-5		
						Algae	1.4	0	7.9E-4		
		80	3.7E-3	80	3.7E-3	Acute	1,342	0	1.4E-5		
						Chronic	50	0	3.7E-4		
						Algae	1.4	0	1.3E-2		
20	2.0E-3	0	0.4	Acute	1,342	0	2.8E-6				
				Chronic	50	0	7.4E-5				
				Algae	1.4	1	0.3				
Univar USA Inc Redmond, WA NPDES: None (FRS: 110036000000)	Surface Water or POTW	Direct and Indirect Surrogate: Organic Chemicals Mfg	Surface Water	350	0.1 (max)	0	18	Acute	1,342	0	1.4E-2
								Chronic	50	25	0.4
				80	3.7	Acute	1,342	0	2.8E-3		
						Chronic	50	7	7.4E-2		
		350	3.0E-2 (avg)	0	5.6	Algae	1.4	77	2.6		
						Acute	1,342	0	4.1E-3		
		Chronic	50	11	0.1						

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		Facility: Unknown						Algae	1.4	100	4.0
						80	1.1	Acute	1,342	0	8.3E-4
								Chronic	50	1	2.2E-2
				20	0.5	0	100	Algae	1.4	37	0.8
								Acute	1,342	0	7.4E-2
								Chronic	50	4	2.0
								Algae	1.4	17	71
<b>OES: Import/Repackaging</b>											
Chemtool Rockton, IL NPDES: IL0064564	Surface Water	IL0064564	Surface Water	250	1.0E-3	0	1.5E-3	Acute	1,342	0	1.1E-6
								Chronic	50	0	2.9E-5
								Algae	1.4	0	1.0E-3
				20	1.5E-2	0	2.2E-2	Acute	1,342	0	1.6E-5
								Chronic	50	0	4.4E-4
								Algae	1.4	0	1.6E-2
Harvey Terminal Harvey, LA NPDES: LA0056600	Surface Water	Surrogate based on location: LA0005291	Surface Water	250	1.0E-4	0	4.1E-07	Acute	1,342	0	3.0E-10
								Chronic	50	0	8.1E-9
								Algae	1.4	0	2.9E-7
				20	1.0E-3	0	4.1E-06	Acute	1,342	0	3.0E-9
								Chronic	50	0	8.1E-8
								Algae	1.4	0	2.9E-6
Hubbard-Hall Inc Waterbury, CT NPDES: None (FRS 110000317194	Non-POTW WWT	Surrogate: Industrial POTW (for receiving facility FRS 11000425054 1)	Surface Water	250	1.1	80	29	Acute	1,342	0	2.2E-2
								Chronic	50	16	0.6
								Algae	1.4	230	21
				20	14	80	360	Acute	1,342	0	0.27
								Chronic	50	14	7.2
								Algae	1.4	20	257
Vopak Terminal Westwego Inc Westwego, LA NPDES: LA0124583	Surface Water	Surrogate based on location: LA0003093	Surface Water	250	5.0E-3	0	2.1E-05	Acute	1,342	0	1.5E-8
								Chronic	50	0	4.0E-7
								Algae	1.4	0	1.4E-5
				20	0.1	0	2.4E-04	Acute	1,342	0	1.8E-7
								Chronic	50	0	4.9E-6
								Algae	1.4	0	1.7E-4
<b>OES: Processing as a Reactant</b>											

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Akzo Nobel Surface Chemistry LLC Morris, IL NPDES: IL0026069	Surface Water	IL0026069	Surface Water	350	1.0E-4	0	2.1E-4	Acute	1,342	0	1.6E-7
								Chronic	50	0	4.2E-6
								Algae	1.4	0	1.49E-04
				20	2.5E-3	0	5.2E-3	Acute	1,342	0	3.88E-06
								Chronic	50	0	1.04E-04
								Algae	1.4	0	0.00372
Atkemix Ten Inc Louisville, KY NPDES: KY0002780	Surface Water	KY0002780	Surface Water	350	7.0E-2	0	3.8E-3	Acute	1,342	0	2.79E-06
								Chronic	50	0	7.50E-05
								Algae	1.4	0	0.0027
				20	1.3	0	6.9E-2	Acute	1,342	0	5.153E-05
								Chronic	50	0	0.0014
								Algae	1.4	0	0.049
Bayer Corporation Haledon, NJ NPDES: NJG104451	Surface Water	Surrogate: Organic Chemical Mfg SIC	Surface Water	350	4.0E-5	0	7.4E-3	Acute	1,342	0	5.51E-06
								Chronic	50	0	1.48E-04
								Algae	1.4	0	0.00528
				20	5.0E-4	0	9.2E-2	Acute	1,342	0	6.88525E-05
								Chronic	50	0	0.001848
								Algae	1.4	0	0.066
Bayer MaterialScience New Martinsville, WV NPDES: WV0005169	Surface Water	WV0005169	Surface Water	350	1.0E-3	0	1.2E-4	Acute	1,342	0	8.86736E-08
								Chronic	50	0	2.38E-06
								Algae	1.4	0	8.50E-05
				20	0.013	0	1.6E-3	Acute	1,342	0	1.15E-06
								Chronic	50	0	3.10E-05
								Algae	1.4	0	0.0011
Chemtura North and South Plants Morgantown, WV NPDES: WV0004740	Surface Water	WV0004740	Surface Water	350	2.0E-5	0	2.9E-5	Acute	1,342	0	2.16E-08
								Chronic	50	0	5.80E-07
								Algae	1.4	0	2.07E-05
				20	5.0E-4	0	7.3E-4	Acute	1,342	0	5.40E-07
								Chronic	50	0	1.45E-05
								Algae	1.4	0	5.18E-04
Dupont-Chemours Montague Site Montague, MI	Surface Water	MI0000884	Still Water	350	2.0E-2	0	2.4	Acute	1,342	0	0.0018
								Chronic	50	0	0.0484
								Algae	1.4	350	1.73



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NPDES: MI0000884				20	0.3	0	35	Acute	1,342	0	0.026
								Chronic	50	0	0.7014
								Algae	1.4	20	25.05
Eagle US 2 LLC - Lake Charles Complex Lake Charles, LA NPDES: LA0000761	Surface Water	LA0000761	Surface Water	350	1.3	0	1.5	Acute	1,342	0	1.1E-3
								Chronic	50	0	3.0E-2
								Algae	1.4	29	1.1
				20	23	0	26	Acute	1,342	0	2.0E-2
								Chronic	50	0	0.5
								Algae	1.4	17	19
Flint Hills Resources Corpus Christi LLC - West Plant Corpus Christi, TX NPDES: TXU001146, TX0006289	Surface Water	TX0006289	Still Water	350	7.0E-2	0	3.0	Acute	1,342	0	2.2E-3
								Chronic	50	0	6.0E-2
								Algae	1.4	350	2.15
				20	1.2	0	52	Acute	1,342	0	3.8E-2
								Chronic	50	20	1.0
								Algae	1.4	20	37
Flint Hills Resources Pine Bend LLC Rosemount, MN NPDES: MN0070246, MN0000418	Surface Water	MN0000418	Surface Water	350	1.0E-2	0	2.8E-3	Acute	1,342	0	2.1E-6
								Chronic	50	0	5.7E-5
								Algae	1.4	0	2.0E-3
				20	0.2	0	5.7E-2	Acute	1,342	0	4.2E-5
								Chronic	50	0	1.1E-3
								Algae	1.4	0	4.0E-2
Honeywell International Inc - Geismar Complex Geismar, LA NPDES: LA0006181	Surface Water	LA0006181	Surface Water	350	2.0E-2	0	8.1E-5	Acute	1,342	0	6.0E-8
								Chronic	50	0	1.6E-6
								Algae	1.4	0	5.8E-5
				20	0.36	0	1.5E-3	Acute	1,342	0	1.1E-6
								Chronic	50	0	2.9E-5
								Algae	1.4	0	1.0E-3
Honeywell International Inc- Baton Rouge Plant	Surface Water	LA0000329	Surface Water	350	5.0E-2	0	4.9	Acute	1,342	0	3.7E-3
								Chronic	50	0	9.9E-2
								Algae	1.4	193	3.53

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Name, Location, and ID of Active Releaser Facility <sup>a</sup>	Release Media <sup>b</sup>	Modeled Facility or Industry Sector in E-FAST <sup>c</sup>	EFAST Waterbody Type <sup>d</sup>	Days of Release <sup>e</sup>	Release (kg/day) <sup>f</sup>	WWT removal %	7Q10 SWC (ppb) <sup>g</sup>	COC Type	COC (ppb)	Days of Exceedance (days/year) <sup>h</sup>	Risk Quotient
Baton Rouge, LA NPDES: LAR10E873, LA0000329				20	0.9	0	85	Acute	1,342	0	6.0E-2
								Chronic	50	7	1.7
								Algae	1.4	20	61
Indorama Ventures Olefins, LLC Sulphur, LA NPDES: LA0069850	Surface Water	Surrogate: Organic Chemical Mfg SIC	Surface Water	350	1.0E-5	0	1.9E-3	Acute	1,342	0	1.4E-6
				20	2.0E-4	0	3.7E-2	Chronic	50	0	3.7E-5
								Algae	1.4	0	1.3E-3
								Acute	1,342	0	2.8E-5
				Chronic	50	0	7.4E-4				
Algae	1.4	0	2.6E-2								
Keeshan And Bost Chemical Co., Inc. Manvel, TX NPDES: TX0072168	Surface Water	TX0072168	Still Water	350	5.0E-5	0	5.0	Acute	1,342	0	3.7E-3
				20	1.0E-3	0	100	Chronic	50	0	0.1
								Algae	1.4	350	3.6
								Acute	1,342	0	7.5E-2
				Chronic	50	20	2.0				
Algae	1.4	20	71								
Phillips 66 Lake Charles Refinery Westlake, LA NPDES: LAR05P540, LA0003026	Surface Water	LA0003026	Surface Water	350	6.0E-2	0	9.5E-2	Acute	1,342	0	7.0E-5
				20	1.0	0	1.6	Chronic	50	0	1.9E-3
								Algae	1.4	0	6.8E-2
								Acute	1,342	0	1.2E-3
				Chronic	50	0	3.2E-2				
Algae	1.4	1	1.2								
Phillips 66 Los Angeles Refinery Wilmington Plant Wilmington, CA NPDES: CA0000035	POTW	Receiving Facility: CA0053856	Still Water	350	0.1	80	0.3	Acute	1,342	0	2.4E-4
								Chronic	50	0	6.4E-3
								Algae	1.4	0	0.2
Premcor Refining Group Inc Port Arthur Port Arthur, TX	Surface Water	TX0005991	Surface Water	350	0.1	0	2.0	Acute	1,342	0	1.5E-3
				20	2.3	0	34	Chronic	50	0	4.0E-2
								Algae	1.4	67	1.4
								Acute	1,342	0	2.6E-2
				Chronic	50	1	0.7				

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NPDES:								Algae	1.4	17	25
Solutia Nitro Site Nitro, WV NPDES: WV0116181	Surface Water	Surrogate: WV0000868	Surface Water	350	2.0E-4	0	5.9E-5	Acute	1,342	0	4.4E-8
								Chronic	50	0	1.2E-6
								Algae	1.4	0	4.2E-5
				20	3.0E-3	0	8.8E-4	Acute	1,342	0	6.6E-7
								Chronic	50	0	1.8E-5
								Algae	1.4	0	6.3E-4
Solvay - Houston Plant Houston, TX NPDES: TX0007072	Surface Water	TX0007072	Surface Water	350	2.0E-2	0	3.7	Acute	1,342	0	2.8E-3
								Chronic	50	0	7.4E-2
								Algae	1.4	8	2.6
				20	0.4	0	76	Acute	1,342	0	5.7E-2
								Chronic	50	0	1.5
								Algae	1.4	8	54
<b>OES: Incorporation into Formulation</b>											
Lord Corp Saegertown, PA NPDES: PA0101800	Non-POTW WWT	Surrogate: Industrial POTW	Surface Water	300	5.3	80	136	Acute	1,342	1	0.1
								Chronic	50	127	2.7
								Algae	1.4	299	97
				20	79	80	2034	Acute	1,342	5	1.5
								Chronic	50	20	41
								Algae	1.4	20	1453
Stepan Co Millsdale Road Elwood, IL NPDES: IL0002453	Surface Water	IL0002453	Surface Water	300	2.0E-3	0	8.4E-4	Acute	1,342	0	1.5E-6
								Chronic	50	0	4.0E-5
								Algae	1.4	0	1.4E-3
				20	2.5E-2	0	1.1E-2	Acute	1,342	0	7.8E-6
								Chronic	50	0	2.1E-4
								Algae	1.4	0	7.5E-3
Tesoro Los Angeles Refinery-Carson Operations Carson, CA	POTW	Receiving Facility: CA0053813	Still Water	300	0.3	80	2.7E-4	Acute	1,342	0	2.0E-7
								Chronic	50	0	5.3E-6
								Algae	1.4	0	1.9E-4

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NPDES: CA0000680											
Weatherford Aerospace LLC Weatherford, TX NPDES: None (FRS 110000743740)	POTW	Receiving Facility: TX0047724	Surface Water	300	2.0E-3	80	6.5E-2	Acute	1,342	0	4.9E-5
								Chronic	50	0	1.3E-3
								Algae	1.4	0	4.7E-2
<b>OES: Open Top Vapor Degreasing</b>											
601 Nassau St Assoc LLC North Brunswick Twp, NJ NPDES: NJG129127	Surface Water	Surrogate: Primary Metal Forming Manufacture	Surface Water	260	1.0E-5	0	1.1E-3	Acute	1,342	0	8.3E-7
								Chronic	50	0	2.2E-5
								Algae	1.4	0	7.9E-4
				20	1.0E-3	0	0.1	Acute	1,342	0	8.2E-5
								Chronic	50	0	2.2E-3
								Algae	1.4	2	7.9E-2
ASCO Valve Manufacturing Aiken, SC NPDES: SC0049026	Surface Water	SC0049026	Surface Water	260	1.0E-4	0	1.E-2	Acute	1,342	0	8.3E-6
								Chronic	50	0	2.2E-4
								Algae	1.4	7	7.9E-3
				20	1.9E-3	0	0.2	Acute	1,342	0	1.6E-4
								Chronic	50	0	4.2E-3
								Algae	1.4	2	0.2
Chemours - Beaumont Works Beaumont, TX NPDES: TX0004669	Surface Water	TX0004669	Surface Water	260	1.0E-2	0	1.4E-2	Acute	1,342	0	1.1E-5
								Chronic	50	0	2.8E-4
								Algae	1.4	0	1.0E-2
				20	8.4E-2	0	0.1	Acute	1,342	0	8.9E-5
								Chronic	50	0	2.4E-3
								Algae	1.4	0	8.6E-2
Delphi Harrison Thermal Systems Dayton, OH NPDES: OH0009431	Surface Water	OH0009431	Surface Water	260	1.0E-2	0	1.9E-2	Acute	1,342	0	1.4E-5
								Chronic	50	0	3.8E-4
								Algae	1.4	0	1.3E-2
				20	8.4E-2	0	0.2	Acute	1,342	0	1.2E-4
								Chronic	50	0	3.2E-3
								Algae	1.4	0	0.1
			Still Water	260	1.0E-2	0	0.2	Acute	1,342	0	1.5E-4

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Equistar Chemicals LP La Porte, TX NPDES: TX0119792		Surrogate: TX0002836		20	0.2	0	3.2	Chronic	50	0	4.0E-3
								Algae	1.4	0	0.1
								Acute	1,342	0	2.4E-3
								Chronic	50	0	6.5E-2
								Algae	1.4	20	2.3
Fairfield Works Fairfield, AL NPDES: AL0003646	Surface Water	AL0003646	Surface Water	260	4.0E-3	0	5.1E-3	Acute	1,342	0	3.7E-6
								Chronic	50	0	1.0E-4
								Algae	1.4	0	3.6E-3
				20	5.3E-2	0	6.7E-2	Acute	1,342	0	5.0E-5
								Chronic	50	0	1.3E-3
								Algae	1.4	0	4.8E-2
Gayston Corp Dayton, OH NPDES: OH0127043	POTW	Surrogate: Primary Metal Forming Manufacture	Surface Water	260	3.0E-3	0	0.3	Acute	1,342	0	2.5E-4
								Chronic	50	5	6.6E-3
								Algae	1.4	25	0.2
				20	4.1E-2	0	4.6	Acute	1,342	0	3.4E-3
								Chronic	50	2	9.1E-2
								Algae	1.4	8	3.26
Getzen Co Inc Elkhorn, WI NPDES: None (FRS110000417291)	POTW	Surrogate: Primary Metal Forming Manufacture	Surface Water	260	3.0E-4	80	6.7E-3	Acute	1,342	0	5.0E-6
								Chronic	50	0	1.3E-4
								Algae	1.4	3	4.8E-3
GM Components Holdings LLC Lockport, NY NPDES: NY0000558	Surface Water	NY0000558	Surface Water	260	7.0E-2	0	5.9	Acute	1,342	0	4.4E-3
								Chronic	50	0	0.1
								Algae	1.4	131	4.2
				20	0.9	0	78	Acute	1,342	0	5.8E-2
								Chronic	50	3	1.6
								Algae	1.4	20	55.46
HB Fuller Co Morris, IL	Surface Water	Surrogate: Primary Metal	Surface Water	260	1.0E-3	0	0.1	Acute	1,342	0	8.2E-5
								Chronic	50	1	2.2E-3
								Algae	1.4	21	7.9E-2

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NPDES: IL0079758		Forming Manufacture		20	1.0E-2	0	1.1	Acute	1,342	0	8.3E-4				
								Chronic	50	1	2.2E-2				
								Algae	1.4	3	0.8				
Hyster-Yale Group, Inc Sulligent, AL NPDES: AL0069787	Surface Water	Surrogate: Primary Metal Forming Manufacture	Surface Water	260	1.0E-6	0	1.1E-4	Acute	1,342	0	8.3E-8				
				20	1.2E-5	0	1.3E-3	Chronic	50	0	2.22E-6				
								Algae	1.4	0	7.9E-05				
				MEMC Electronic Materials Incorporated Moore, SC NPDES: SC0036145	Surface Water	SC0036145	Surface Water	260	3.0E-4	0	1.0E-2	Acute	1,342	0	7.5E-6
								20	3.4E-3	0	0.1	Chronic	50	0	2.0E-4
												Algae	1.4	0	7.2E-3
Piano Factory- Grand Haven Grand Haven, MI NPDES: MI0054399	Surface Water	Surrogate: Primary Metal Forming Manufacture	Surface Water					260	1.0E-3	0	0.1	Acute	1,342	0	8.2E-5
								20	9.3E-3	0	1.0	Chronic	50	1	2.2E-3
												Algae	1.4	21	7.9E-2
				Rex Heat Treat Lansdale Inc Lansdale, PA NPDES: PA0052965	Surface Water	Surrogate: PA0026182	Surface Water	260	2.0E-3	0	5.4E-2	Acute	1,342	0	4.0E-5
								20	2.5E-2	0	0.7	Chronic	50	0	1.1E-3
												Algae	1.4	0	0.03.9E-2
Styrolution America LLC Channahon, IL	Surface Water	IL0001619	Surface Water					260	1.0E-5	0	3.5E-6	Acute	1,342	0	2.6E-9
												Chronic	50	0	6.9E-8
												Algae	1.4	0	2.5E-6

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NPDES: IL0001619				20	8.3E-3	0	2.9E-3	Acute	1,342	0	2.2E-6
								Chronic	50	0	5.8E-5
								Algae	1.4	0	2.1E-3
Trane Residential Solutions - Fort Smith Fort Smith, AR NPDES: AR0052477	Surface Water	Surrogate: Primary Metal Forming Manufacture	Surface Water	260	1.0E-5	0	1.1E-3	Acute	1,342	0	8.3E-7
								Chronic	50	0	2.2E-5
								Algae	1.4	0	7.9E-4
				20	1.7E-4	0	1.9E-2	Acute	1,342	0	1.4E-5
								Chronic	50	0	3.8E-4
Algae	1.4	1	1.4E-2								
US Steel Fairless Hills Facility Fairless Hills, PA NPDES: PA0013463	Surface Water	PA0013463	Surface Water	260	1.0E-3	0	1.7E-4	Acute	1,342	0	1.2E-7
								Chronic	50	0	3.3E-6
								Algae	1.4	0	1.2E-4
				20	1.3E-2	0	2.2E-3	Acute	1,342		1.6E-6
								Chronic	50	0	4.3E-5
								Algae	1.4	0	1.5E-3
<b>OES: Dry Cleaning (Commercial and Industrial)</b>											
12,822 Commercial Dry cleaning Sites		Surrogate: Laundry/Dry Cleaner SIC	Surface Water	307	2.0E-2 (high-end)	80	0.4	Acute	1,342	0	2.8E-4
								Chronic	50	0	7.6E-3
								Algae	1.4	0	0.3
				289	1.0E-3 (central tendency)	80	0.2	Acute	1,342	0	1.4E-4
								Chronic	50	0	3.8E-3
Algae	1.4	0	0.1								
Boise State University Boise, ID NPDES: IDG911006	Surface Water	Surrogate: Laundry/Dry Cleaner SIC	Surface Water	289	2.0E-4 (high-end)	0	0.1	Acute	1,342	0	8.2E-5
								Chronic	50	0	2.2E-3
								Algae	1.4	0	7.9E-2
				307	2.0E-4 (central tendency)	0	0.1	Acute	1,342	0	8.2E-5
								Chronic	50	0	0.002.2E-3
				20	3.0E-3	0	1.7	Acute	1,342	0	1.3E-3
								Chronic	50	0	3.4E-2
Algae	1.4	1	1.2								

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Unifirst Williamstown, VT NPDES: VT0000850	Surface Water	Surrogate: Laundry/Dry Cleaner SIC	Surface Water	289	5.0E-5 (high-end)	0	2.8E-2	Acute	1,342	0	2.1E-5
								Chronic	50	0	5.7E-4
								Algae	1.4	0	0.2
				307	4.0E-5 (central tendency)	0	2.3E-2	Acute	1,342	0	1.7E-5
								Chronic	50	0	4.5E-4
								Algae	1.4	0	1.6E-2
				20	6.8E-4	0	0.4	Acute	1,342	0	2.9E-4
								Chronic	50	0	7.8E-3
								Algae	1.4	0	0.3
<b>OES: Chemical Maskant</b>											
Alliant Techsystems Operations LLC Elkton, MD NPDES: MD0000078	Surface Water	MD0000078	Surface Water	172	5.8E-6	0	5.3E-4	Acute	1,342	0	4.0E-7
								Chronic	50	0	1.1E-5
								Algae	1.4	0	3.8E-4
				20	5.0E-5	0	4.6E-3	Acute	1,342	0	3.4E-6
								Chronic	50	0	9.2E-5
								Algae	1.4	0	3.3E-3
Ducommun Aerostructures Inc Orange Facility Orange, CA NPDES: None (110070089239)	POTW	Surrogate: Metal Finishing SIC (surrogate for receiving facility CA0110604)	Surface Water	172	2.6E-3	80	6.8E-2	Acute	1,342	0	5.0E-5
								Chronic	50	0	1.4E-3
								Algae	1.4	0	4.8E-2
GE Aviation Lynn, MA NPDES: MA0003905	Surface Water	MA0003905	Still Water	172	8.7E-4	0	3.7E-3	Acute	1,342	0	2.8E-6
								Chronic	50	0	7.4E-5
								Algae	1.4	0	2.6E-3
				20	7.5E-3	0	3.2E-2	Acute	1,342	0	2.4E-5
								Chronic	50	0	6.4E-4
								Algae	1.4	0	2.2E-2
McCanna Inc. Carpentersville, IL	Surface Water	Surrogate: Metal Finishing SIC	Surface Water	172	4.1E-4	0	0.2	Acute	1,342	0	1.3E-4
								Chronic	50	0	3.4E-3
								Algae	1.4	0	0.1
				20	3.5E-3	0	1.3	Acute	1,342	0	9.9E-4



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NPDES: IL0071340								Chronic	50	0	2.7E-2
								Algae	1.4	0	1.0
Weatherford Aerospace LLC Weatherford, TX NPDES: None (FRS 110000743740)	POTW	Receiving Facility: TX0047724	Surface Water	208	1.1E-2	80	0.3	Acute	1,342	0	2.1E-4
								Chronic	50	0	5.6E-3
								Algae	1.4	0	0.2
<b>OES: Industrial Processing Aid</b>											
Chevron Products Co - Salt Lake Refinery <i>Salt Lake City, UT</i> NPDES: UTG070261, UT0000175	Surface Water	UT0000175	Surface Water	300	1.0E-2	0	0.3	Acute	1,342	0	2.3E-4
								Chronic	50	0	6.2E-3
								Algae	1.4	0	0.2
				20	8.7E-2	0	2.7	Acute	1,342	0	2.0E-3
								Chronic	50	0	5.4E-2
Chevron Products Co Richmond Refinery Richmond, CA NPDES: CA0005134	Surface Water	CA0005134	Surface Water	300	3.0E-3	0	0.2	Acute	1,342	0	1.3E-4
								Chronic	50	0	3.4E-3
								Algae	1.4	0	0.1
				20	4.6E-2	0	2.7	Acute	1,342	0	2.0E-3
								Chronic	50	0	5.3E-2
CHS McPherson Refinery McPherson, KS NPDES: KS0000337	Surface Water	KS0000337	Surface Water	300	3.0E-4	0	4.4E-2	Acute	1,342	0	3.3E-5
								Chronic	50	0	8.8E-4
								Algae	1.4	0	3.2E-2
				20	4.5E-3	0	0.7	Acute	1,342	0	4.9E-4
								Chronic	50	0	1.3E-2
ExxonMobil Oil Beaumont Refinery Beaumont, TX NPDES: None	Surface Water	TX0068934	Surface Water	300	20E-2	0	5.5	Acute	1,342	0	4.1E-3
								Chronic	50	0	0.11
								Algae	1.4	55	4.0
				20	0.4	0	97	Acute	1,342	0	7.2E-2
								Chronic	50	2	1.9
								Algae	1.4	20	69

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(FRS 110056963683)											
HollyFrontier El Dorado Refining LLC El Dorado, KS NPDES: KS0000761	Surface Water	KS0000761	Surface Water	300	3.0E-3	0	0.6	Acute	1,342	0	4.4E-4
								Chronic	50	0	1.2E-2
								Algae	1.4	2	0.4
				20	4.6E-2	0	9.1	Acute	1,342	0	6.8E-3
								Chronic	50	0	0.2
								Algae	1.4	6	6.5
Hunt Refining Co - Tuscaloosa Refinery Tuscaloosa, AL NPDES: AL0000973	Surface Water	AL0000973	Surface Water	300	1.1E-2	0	3.3E-2	Acute	1,342	0	2.5E-5
								Chronic	50	0	6.6E-4
								Algae	1.4	0	2.4E-2
				20	0.2	0	0.7	Acute	1,342	0	4.9E-4
								Chronic	50	0	1.3E-2
								Algae	1.4	0	0.5
Marathon Petroleum Co LP Garyville, LA NPDES: LAU009485, LA0045683	Surface Water	LA0045683	Still Water	300	1.0E-2	0	0.5	Acute	1,342	0	3.5E-4
								Chronic	50	0	9.4E-3
								Algae	1.4	0	0.3
				20	0.1	0	6.6	Acute	1,342	0	4.9E-3
								Chronic	50	0	0.1
								Algae	1.4	20	4.7
Occidental Chemical Corp Niagara Plant Niagara Falls, NY NPDES: NY0003336	Surface Water and POTW	Direct (0% WWT Removal): NY0003336	Still Water	300	0.2	0	1.3	Acute	1,342	0	9.6E-4
								Chronic	50	0	2.6E-2
								Algae	1.4	0	0.9
		Indirect (80% WWT Removal): Organic Chemicals Mfg (surrogate for NY0026336)	Surface Water	300	0.2	80	6.3	Acute	1,342	0	4.7E-3
								Chronic	50	11	0.1
								Algae	1.4	92	4.5
		Still Water	20	2.6	0	20	Acute	1,342	0	1.5E-2	
							Chronic	50	0	0.4	
							Algae	1.4	20	14	
				300	3.0E-2	0	12	Acute	1,342	0	8.9E-3

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Tesoro Los Angeles Refinery-Carson Operations Carson, CA NPDES: CA0000680	Surface Water and POTW	Direct (0% WWT removal): Petroleum Refining	Surface Water					Chronic	50	17	0.2
								Algae	1.4	169	8.5
			Surface Water	300	3.0E-2	80	2.4E-5	Acute	1,342	0	1.8E-8
								Chronic	50	0	4.8E-7
		Indirect (80% WWT removal): CA0053813	Surface Water	20	0.4	0	171	Acute	1,342	1	0.1
								Chronic	50	7	3.4
			Surface Water					Algae	1.4	19	122
The Dow Chemical Co Midland, MI NPDES: MI0000868	Surface Water	MI0000868	Surface Water	300	3.0E-2	0	4.8E-2	Acute	1,342	0	3.5E-5
								Chronic	50	0	9.5E-4
								Algae	1.4	0	3.4E-2
			Surface Water	20	0.5	0	0.8	Acute	1,342	0	6.1E-4
								Chronic	50	0	1.6E-2
								Algae	1.4	1	0.6
Valero Refining Co -Oklahoma Valero Ardmore Refinery Ardmore, OK NPDES: OK0001295	Surface Water	OK0001295	Surface Water	300	1.0E-2	0	0.7	Acute	1,342	0	4.8E-4
								Chronic	50	0	1.3E-2
								Algae	1.4	6	0.5
			Surface Water	20	0.1	0	7.1	Acute	1,342	0	5.3E-3
								Chronic	50	0	0.1
								Algae	1.4	9	5.1
Valero Refining Co -Oklahoma Valero Ardmore Refinery Ardmore, OK NPDES: OK0001295	Surface Water	Surrogate: Organic Chemicals Mfg	Surface Water	300	1.0E-2	0	1.9	Acute	1,342	0	1.4E-3
								Chronic	50	2	3.7E-2
								Algae	1.4	42	1.3
			Surface Water	20	0.1	0	26	Acute	1,342	0	1.9E-2
								Chronic	50	2	0.5
								Algae	1.4	12	18
<b>OES: Other Industrial Uses</b>											
ExxonMobil Oil Corp Joilet Refinery Channahon, IL	Surface Water	ILR10H432	Surface Water	250	5.0E-3	0	1.7E-3	Acute	1,342	0	1.3E-6
								Chronic	50	0	3.5E-5
			Surface Water	20	5.9E-2	0	2.1E-2	Algae	1.4	0	1.2E-3
								Acute	1,342	0	1.5E-5

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NPDES: ILR10H432								Chronic	50	0	4.1E-4
								Algae	1.4	0	1.5E-2
Natrium Plant New Martinsville, WV NPDES: WV0004359	Surface Water	WV0004359	Surface Water	250	3.0E-2	0	3.6E-3	Acute	1,342	0	2.7E-6
								Chronic	50	0	7.1E-5
				20	0.4	0	4.6E-2	Algae	1.4	0	2.6E-3
								Acute	1,342	0	3.5E-5
								Chronic	50	0	9.3E-4
								Algae	1.4	0	3.3E-2
Oxy Vinyls LP - Deer Park PVC Deer Park, TX NPDES: TX0007412	Surface Water	TX0007412	Surface Water	250	0.3	0	1.0	Acute	1,342	0	7.5E-4
								Chronic	50	0	2.0E-2
				20	3.9	0	13	Algae	1.4	38	0.7
								Acute	1,342	0	9.4E-3
								Chronic	50	0	0.3
								Algae	1.4	17	9.0
Princeton Plasma Physics Lab (FF) Princeton, NJ NPDES: NJ0023922	Surface Water	Surrogate: Industrial POTW	Surface Water	250	1.0E-3	0	0.1	Acute	1,342	0	9.7E-5
								Chronic	50	0	2.6E-3
				20	6.6E-3	0	0.9	Algae	1.4	0	9.3E-2
								Acute	1,342	0	6.3E-4
								Chronic	50	0	1.7E-2
								Algae	1.4	1	0.6
Tree Top Inc Wenatchee Plant Wenatchee, WA NPDES: WA0051527	Surface Water	Industrial POTW	Surface Water	250	3.0E-5	0	3.9E-3	Acute	1,342	0	2.9E-6
								Chronic	50	0	7.7E-5
				20	3.8E-4	0	4.9E-2	Algae	1.4	0	2.8E-3
								Acute	1,342	0	3.6E-5
								Chronic	50	0	9.8E-4
								Algae	1.4	0	3.5E-2
Vesuvius USA Corp Buffalo Plant Buffalo, NY NPDES: NY0030881	Surface Water	Surrogate: Industrial POTW	Surface Water	250	1.0E-3	0	0.1	Acute	1,342	0	9.7E-5
								Chronic	50	0	2.6E-3
				20	1.5E-3	0	0.2	Algae	1.4	0	9.3E-2
								Acute	1,342	0	1.4E-4
								Chronic	50	0	3.8E-3
								Algae	1.4	0	0.1
		CA0059188		250	1.0E-6	0	0.1	Acute	1,342	0	7.5E-5

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William E. Warne Power Plant Los Angeles County, CA NPDES: CA0059188	Surface Water		Surface Water	20	1.4E-5	0	1.4	Chronic	50	0	2.0E-3
								Algae	1.4	0	7.1E-2
								Acute	1,342	0	1.1E-3
								Chronic	50	0	2.8E-2
								Algae	1.4	0	1.1
<b>OES: Other Commercial Uses</b>											
Union Station North Wing Office Building Denver, CO NPDES: COG315293	Surface Water	Surrogate: Industrial POTW	Surface Water	250	3.0E-3	0	0.4	Acute	1,342	0	2.9E-4
								Chronic	50	0	7.8E-3
								Algae	1.4	4	0.3
								Acute	1,342	0	3.5E-3
								Chronic	50	0	9.3E-2
Confluence Park Apartments Denver, CO NPDES: COG315339	Surface Water	Surrogate: Industrial POTW	Surface Water	250	3.0E-4	0	3.9E-2	Acute	1,342	0	2.9E-5
								Chronic	50	0	7.7E-4
								Algae	1.4	0	2.8E-2
								Acute	1,342	0	3.6E-4
								Chronic	50	0	9.6E-3
Wynkoop Denver LLC St Denver, CO NPDES: COG603115	Surface Water	Surrogate: Industrial POTW	Surface Water	250	2.0E-4	0	2.6E-2	Acute	1,342	0	1.9E-5
								Chronic	50	0	5.2E-4
								Algae	1.4	0	1.8E-2
								Acute	1,342	0	1.8E-4
								Chronic	50	0	4.8E-3
100 Saint Paul Denver County, CO NPDES: COG315289	Surface Water	Surrogate: Industrial POTW	Surface Water	250	4.0E-5	0	5.2E-3	Acute	1,342	0	3.8E-6
								Chronic	50	0	1.0E-4
								Algae	1.4	0	3.7E-3
								Acute	1,342	0	5.1E-5
								Chronic	50	0	1.4E-3
BPI-Westminster, LLC(Owner)/Arc	Surface Water		Surface Water	250	3.0E-5	0	3.9E-3	Acute	1,342	0	2.9E-6
								Chronic	50	0	7.7E-5
								Algae	1.4	0	4.9E-2

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adis (Op) Denver, CO NPDES: COG315146		Surrogate: Industrial POTW		20	4.3E-4	0	5.5E-2	Algae	1.4	0	2.8E-3
								Acute	1,342	0	4.1E-5
								Chronic	50	0	1.1E-3
								Algae	1.4	0	4.0E-2
Safeway Inc Denver, CO NPDES: COG315260	Surface Water	Surrogate: Industrial POTW	Surface Water	250	2.0E-5	0	2.6E-3	Acute	1,342	0	1.9E-6
								Chronic	50	0	5.2E-5
								Algae	1.4	0	1.8E-3
				20	2.0E-4	0	2.6E-2	Acute	1,342	0	1.9E-5
								Chronic	50	0	5.2E-4
								Algae	1.4	0	1.8E-2
Illinois Central Railroad Thompsonville, IL NPDES: IL0070696	Surface Water	Surrogate: Industrial POTW	Surface Water	250	1.0E-5	0	1.3E-3	Acute	1,342	0	9.6E-7
								Chronic	50	0	2.6E-5
								Algae	1.4	0	9.2E-4
				20	1.6E-4	0	2.1E-2	Acute	1,342	0	1.5E-5
								Chronic	50	0	4.1E-4
								Algae	1.4	0	1.5E-2
<b>OES: Waste Handling, Disposal, Treatment, and Recycling</b>											
Clean Harbors Deer Park LLC La Porte, TX NPDES: TX0005941	Non- POTW WWT	Surrogate: Industrial POTW	Surface Water	250	0.4	80	9.1	Acute	1,342	0	6.7E-3
								Chronic	50	2	0.2
								Algae	1.4	172	6.4
				20	4.4	80	113	Acute	1,342	0	8.4E-2
								Chronic	50	7	2.3
								Algae	1.4	20	80
Clean Harbors El Dorado LLC El Dorado, AR NPDES: AR0037800	Non- POTW WWT	Surrogate: Industrial POTW	Surface Water	250	4.0E-2	80	1.0	Acute	1,342	0	7.7E-4
								Chronic	50	0	2.1E-2
								Algae	1.4	24	0.7
				20	0.5	80	12	Acute	1,342	0	8.8E-3
								Chronic	50	0	0.2
								Algae	1.4	15	8.5
Clean Harbors Recycling Services of Ohio LLC Hebron, OH	POTW	Receiving Facility: OH0021539	Surface Water	250	3.0E-5	80	3.2E-4	Acute	1,342	0	2.4E-7
								Chronic	50	0	6.4E-6

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NPDES: None (FRS 110070118494)								Algae	1.4	0	2.3E-4
Clean Water Of New York Inc Staten Island, NY NPDES: NY0200484	Surface Water	Surrogate: Industrial POTW SIC code	Surface Water	250	4.0E-3	0	0.5	Acute	1,342	0	3.9E-4
								Chronic	50	0	1.0E-2
								Algae	1.4	7	0.4
				20	4.7E-2	0	6.1	Acute	1,342	0	4.5E-3
								Chronic	50	0	0.1
								Algae	1.4	11	4.3
Clifford G Higgins Disposal Service Inc SLF Kingston, NJ NPDES: NJG160946	Surface Water	Surrogate: Industrial POTW SIC code	Surface Water	250	2.0E-4	0	2.6E-2	Acute	1,342	0	1.9E-5
								Chronic	50	0	5.2E-4
								Algae	1.4	0	1.8E-2
				20	2.5E-3	0	0.3	Acute	1,342	0	2.4E-4
								Chronic	50	0	6.4E-3
								Algae	1.4	0	0.2
Durez North Tonawanda Occidental Chemical Corporation North Tonawanda, NY NPDES: NY0001198	Surface Water	NY0001198	Surface Water	250	1.0E-4	0	5.3E-2	Acute	1,342	0	4.0E-5
								Chronic	50	0	1.1E-3
								Algae	1.4	0	3.8E-2
				20	5.0E-4	0	0.3	Acute	1,342	0	2.0E-4
								Chronic	50	0	5.4E-3
								Algae	1.4	0	0.2
Heritage Thermal Services East Liverpool, OH NPDES: OH0107298	POTW	Receiving Facility: OH0024970	Surface Water	250	3.6E-7	80	9.7E-9	Acute	1,342	0	7.2E-12
								Chronic	50	0	1.9E-10
								Algae	1.4	0	6.9E-9
Oiltanking Houston Inc Houston, TX NPDES: TX0091855	Surface Water	Surrogate location: TX0005941	Surface Water	250	3.0E-3	0	0.3	Acute	1,342	0	2.5E-4
								Chronic	50	0	6.6E-3
								Algae	1.4	0	0.2
				20	4.2E-2	0	4.6	Acute	1,342	0	3.4E-3
								Chronic	50	0	9.2E-2
								Algae	1.4	1	3.3

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Pinewood Site Custodial Trust Pinewood, SC NPDES: SC0042170	Surface Water	Surrogate: Industrial POTW SIC code	Surface Water	250	1.0E-3	0	0.1	Acute	1,342	0	9.7E-5
								Chronic	50	0	2.6E-3
								Algae	1.4	0	9.3E-2
				20	7.5E-3	0	1.0	Acute	1,342	0	7.2E-4
								Chronic	50	0	1.9E-2
								Algae	1.4	2	0.7
Safety-Kleen Systems Inc Smithfield, KY NPDES: KY0098345	Non-POTW WWT	Surrogate: Industrial POTW SIC code (surrogate for receiving facility MDU000011)	Surface Water	250	1.4	80	35	Acute	1,342	0	2.6E-2
								Chronic	50	22	0.7
								Algae	1.4	235	25
				20	17	80	436	Acute	1,342	0	0.3
								Chronic	50	15	8.7
								Algae	1.4	20	311
Safety-Kleen Systems Inc, East Chicago, IN NPDES: Unknown	POTW	Receiving Facility: IN0022829	Surface Water	250	0.3	80	0.8	Acute	1,342	3	6.0E-4
								Chronic	50	10	1.6E-2
								Algae	1.4	148	0.6
Tier Environmental LLC Bedford, OH NPDES: None (FRS 110000388232)	POTW	Surrogate: Industrial POTW SIC code	Surface Water	250	0.1	80	3.1	Acute	1,342	0	2.3E-3
								Chronic	50	0	6.2E-2
								Algae	1.4	90	2.2
Tradebe Treatment & Recycling LLC East Chicago, IN NPDES: None (FRS 110070334821)	Non-POTW WWT	Surrogate: Industrial POTW SIC code (surrogate for FRS 110020159852)	Surface Water	250	5.0E-3	80	0.1	Acute	1,342	0	9.7E-5
								Chronic	50	0	2.6E-3
								Algae	1.4	0	9.3E-2
				20	6.8E-2	80	1.8	Acute	1,342	0	1.3E-3
								Chronic	50	0	3.5E-2
								Algae	1.4	4	1.3

- a. Facilities actively releasing PCE were identified via DMR, TRI and CDR databases for the 2016 reporting year.
- b. Release media are either direct (release from active facility directly to surface water) or indirect (transfer of wastewater from active facility to a receiving POTW or non-POTW WWTP facility). A wastewater treatment removal rate of 80% is applied to all indirect releases, as well as direct releases from WWTPs.

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- c. If a valid NPDES of the direct or indirect releaser was not available in EFAST, the release was modeled using either a surrogate representative facility in EFAST (based on location) or a representative industry sector. If available in TRI, the NPDES of the receiving facility is provided.
  - d. E-FAST 2014 ([U.S. EPA 2014b](#)) uses the “surface water” model for free-flowing water bodies such as rivers and streams, and the “still water” model for lakes, bays, and oceans. The surface water model uses stream flow values to calculate the concentration, whereas the still water model uses dilution factors. The dilution factor used in E-FAST is provided in parenthesis.
  - e. Modeling was conducted with the maximum days of release per year estimated. For direct releasing facilities, a minimum of 20 days was also modeled.
  - f. The daily release amount was calculated from the reported annual release amount divided by the number of release days per year.
  - g. The harmonic mean is not applicable for discharges to still water. For discharges to free-flowing water using an industry sector flow, the 10<sup>th</sup> percentile harmonic mean is reported.
  - h. For releases discharging to lakes, bays, estuaries, and oceans, the acute scenario mixing zone water concentration was reported in place of the 7Q10 SWC. For discharges to free-flowing water using an industry sector flow, the 10<sup>th</sup> percentile 7Q10 is reported.

10073 **4.5.2 Human Health Risk Conclusions**

10074 **4.5.2.1 Summary of Risk Estimates for Inhalation and Dermal Exposures to**  
 10075 **Workers and ONUs**

10076 Table 4-112 summarizes the risk estimates for inhalation and dermal exposures for all occupational  
 10077 exposure scenarios. Risk estimates that exceed the benchmark (i.e. MOEs less than the benchmark MOE  
 10078 or cancer risks greater than the cancer risk benchmark) are highlighted by bolding the number and  
 10079 shading the cell both with and without assumed PPE. The PPE protection factor is listed in  
 10080 parentheses beneath the risk value. The lowest APF/glove PF that eliminated risk (or APF 50/glove PF  
 10081 20 if risk was not eliminated) was presented. The risk characterization is described in more detail in  
 10082 Section 4.2.2 and specific links to the exposure and risk characterization sections are listed in Table  
 10083 4-112 in the column headed Occupational Exposure Scenario.

10084  
 10085 Of note, the risk summary below is based on the most sensitive acute and chronic non-cancer endpoints  
 10086 (neurotoxicity) as well as cancer. For the majority of exposure scenarios, when risks were identified for  
 10087 the chronic non-cancer endpoint (neurotoxicity), risks were also identified for kidney (urinary markers  
 10088 of nephrotoxicity) and immune system toxicity.

10089  
 10090 EPA made OES-specific determinations of assumed respirator use (see Section 4.2.2.2). When respirator  
 10091 use was considered plausible for the use scenario, the following PPE protection limits were considered  
 10092 for purposes of risk determination (Section 5.3), displayed in Table 4-111. Risk estimates are shown for  
 10093 all OES in Table 4-112 as a what-if scenario, even if those limits are not used for risk determination.  
 10094 Footnotes indicate for which individual OES respirator use is not assumed.

10095 **Table 4-111. PPE Protection Limits Considered for Risk Determination by Sector**

Sector	APF	Glove PF
Manufacturing	50	20
Import/Processing/Disposal	25	20
Industrial	25	10
Commercial	10	5
Consumer	None	None

10098 Table 4-112 Summary of Risk Estimates for Inhalation and Dermal Exposures to Workers by Condition of Use

Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE		
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )
Manufacture/ Domestic manufacture	Domestic manufacture	Section 2.4.1.6 – Manufacturing and Section 4.2.2.3 for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>1.9</b>	<b>8.7</b>	<b>6.1E-4</b>	19 (APF 10)	218 (APF 25)	6.1E-5 (APF 10)
					Central Tendency	154	701	5.9E-6	1538 (APF 10)	17,520 (APF 25)	5.9E-7 (APF 10)
				Inhalation 12 hr	High-End	16	<b>72</b>	7.5E-5	156 (APF 10)	716 (APF 10)	7.5E-6 (APF 10)
					Central Tendency	161	741	5.6E-6	1610 (APF 10)	7407 (APF 10)	5.6E-7 (APF 10)
				Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)
					Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)
			ONUs	Inhalation 8 hr	High-End	<b>1.9</b>	<b>8.7</b>	<b>6.1E-4</b>	N/A	N/A	N/A
					Central Tendency	154	701	5.9E-6	N/A	N/A	N/A
				Inhalation 12 hr	High-End	16	<b>72</b>	7.5E-5	N/A	N/A	N/A
					Central Tendency	161	741	5.6E-6	N/A	N/A	N/A
				Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)
					Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)
Manufacture/ Import	Import	Section 2.4.1.7 - Repackaging and Section 0 - 2 EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown. Repackaging for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>6.1</b>	<b>28</b>	<b>1.9E-4</b>	61 (APF 10)	278 (APF 10)	1.9E-5 (APF 10)
					Central Tendency	11.5	<b>52</b>	7.9E-5	115 (APF 10)	523 (APF 10)	7.9E-6 (APF 10)
				Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)
					Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)
			ONUs	Inhalation 8 hr	High-End	<b>6.1</b>	<b>28</b>	<b>1.9E-4</b>	N/A	N/A	N/A
					Central Tendency	11.5	<b>52</b>	7.9E-5	N/A	N/A	N/A
				Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)
					Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE			
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
Processing/ Processing as a reactant/ intermediate	Intermediate in industrial gas manufacturing	Section 2.4.1.8– Processing as a Reactant and Section 4.2.2.5 - Processing as Reactant for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>1.9</b>	<b>8.7</b>	<b>6.1E-4</b>	19 (APF 10)	218 (APF 25)	6.1E-5 (APF 10)	
					Central Tendency	154	701	5.9E-6	1538 (APF 10)	17520 (APF 25)	5.9E-7 (APF 10)	
	Inhalation 12 hr			High-End	15.6	<b>72</b>	7.5E-5	156 (APF 10)	716 (APF 10)	7.5E-6 (APF 10)		
				Central Tendency	161	741	5.6E-6	1610 (APF 10)	7407 (APF10)	5.6E-7 (APF 10)		
	Dermal			High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)		
				Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)		
	Intermediate in basic organic chemical manufacturing		Intermediate in petroleum refineries	Worker	Inhalation 8 hr	High-End	<b>1.9</b>	<b>8.7</b>	<b>6.1E-4</b>	N/A	N/A	N/A
						Central Tendency	154	701	5.9E-6	N/A	N/A	N/A
			Inhalation 12 hr	High-End	15.6	<b>72</b>	7.5E-5	N/A	N/A	N/A		
				Central Tendency	161	741	5.6E-6	N/A	N/A	N/A		
Residual or byproduct reused as a reactant <sup>a</sup>	Worker	Inhalation 8 hr	High-End	<b>0.38</b>	<b>1.7</b>	<b>3.1E-3</b>	19 (APF 50)	<b>84</b> (APF 50)	6.2E-5 (APF 50)			
			Central Tendency	<b>0.60</b>	<b>2.7</b>	<b>1.5E-3</b>	30 (APF 50)	132 (APF 50)	3.0E-5 (APF 50)			
Processing/ Incorporated into formulation mixture or reaction product	Cleaning and degreasing products	Section 2.4.1.9 – Incorporation into Formulation, Mixture, or Reactant Product and Section 4.2.2.6 - Incorporation into Formulation, Mixture, or Reactant Product Based on Aerosol Packing for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)	
					Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)	
	Dermal			High-End	<b>0.38</b>	<b>1.7</b>	<b>3.1E-3</b>	N/A	N/A	N/A		
				Central Tendency	<b>0.60</b>	<b>2.7</b>	<b>1.5E-3</b>	N/A	N/A	N/A		
	Adhesive and sealant products		Worker	Inhalation 8 hr	High-End	<b>1.9</b>	<b>92</b>	1.7E-5	19 (APF 10)	918 (APF 10)	1.7E-6 (APF 10)	
					Central Tendency	154	741	5.6E-6	N/A	N/A	N/A	
Paint and coating products	Worker	Inhalation 8 hr	High-End	<b>0.38</b>	<b>1.7</b>	<b>3.1E-3</b>	N/A	N/A	N/A			
			Central Tendency	<b>0.60</b>	<b>2.7</b>	<b>1.5E-3</b>	N/A	N/A	N/A			
Other chemical products and preparations	Worker	Inhalation 8 hr	High-End	<b>1.9</b>	<b>92</b>	1.7E-5	19 (APF 10)	918 (APF 10)	1.7E-6 (APF 10)			
			Central Tendency	154	741	5.6E-6	N/A	N/A	N/A			

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE		
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )
		Formulation, Mixture, or Reactant Product and Section 4.2.2.6 - Incorporation into Formulation, Mixture, or Reactant Product Based on Degreasing Solvent for inhalation risks and Section 4.2.3 for dermal risks	ONUs	Central Tendency	High-End	<b>6.9</b>	328	4.7E-6	69 (APF 10)	3277 (APF 10)	4.7E-7 (APF 10)
	Dermal				Central Tendency	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)
	Central Tendency			High-End	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)	
				High-End	<b>1.9</b>	<b>92</b>	1.7E-5	N/A	N/A	N/A	
	Central Tendency			High-End	<b>6.9</b>	328	4.7E-6	N/A	N/A	N/A	
				High-End	<b>0.35</b>	<b>17</b>	9.1E-5	18 (APF 50)	169 (APF 10)	9.1E-6 (APF 10)	
	Section 2.4.1.9 – Incorporation into Formulation, Mixture, or Reactant Product and Section 4.2.2.6 - Incorporation into Formulation, Mixture, or Reactant Product Based on Dry Cleaning Solvent for inhalation risks and Section 4.2.3 for dermal risks	Worker	Worker	Inhalation 8 hr	Central Tendency	<b>1.3</b>	<b>60</b>	2.5E-5	63 (APF 50)	604 (APF 10)	2.5E-6 (APF 10)
					Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)
				Central Tendency	High-End	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)
					High-End	<b>0.35</b>	<b>17</b>	9.1E-5	N/A	N/A	N/A
				Central Tendency	High-End	<b>1.3</b>	<b>60</b>	2.5E-5	N/A	N/A	N/A
					High-End	<b>3.5</b>	<b>169</b>	9.1E-6	89 (APF 25)	1693 (APF 10)	9.1E-7 (APF 10)
	Section 2.4.1.9 – Incorporation into Formulation, Mixture, or Reactant Product and Section 4.2.2.6 - Incorporation into Formulation, Mixture, or Reactant Product Based on Miscellaneous for inhalation risks and Section 4.2.34.2.3.1 for dermal risks	Worker	Worker	Inhalation 8 hr	Central Tendency	13	602	2.6E-6	315 (APF 25)	6017 (APF 10)	2.6E-7 (APF 10)
					Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)
				Central Tendency	High-End	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)
					High-End	<b>3.5</b>	<b>169</b>	9.1E-6	N/A	N/A	N/A
				Central Tendency	High-End	<b>1.3</b>	<b>602</b>	2.6E-6	N/A	N/A	N/A
					High-End	<b>3.5</b>	<b>169</b>	9.1E-6	N/A	N/A	N/A

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE		
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )
Processing/ Incorporated into articles	Plastic and rubber products	Not assessed – after further review, EPA determined that PCE is not incorporated into plastic articles but rather is used as a degreasing solvent at plastic manufacture sites which are assessed in Sections 2.4.1.10 through 2.4.1.15									
Processing/ Repackaging	Solvent for cleaning or degreasing Intermediate	Section 2.4.1.7 – Repackaging and Section 0 - 2 EPA is unable to estimate ONU exposures separately from workers. EPA used worker central tendency values as a surrogate to assess risk for ONUs; however, the statistical representativeness of this value for ONUs is unknown. Repackaging for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>6.1</b>	<b>28</b>	<b>1.9E-4</b>	61 (APF 10)	278 (APF 10)	1.9E-5 (APF 10)
					Central Tendency	11.5	<b>52</b>	7.9E-5	115 (APF 10)	523 (APF 10)	7.9E-6 (APF 10)
	Dermal			High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)	
				Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)	
	ONUs		Inhalation 8 hr	High-End	<b>6.1</b>	<b>28</b>	<b>1.9E-4</b>	N/A	N/A	N/A	
				Central Tendency	11.5	<b>52</b>	7.9E-5	N/A	N/A	N/A	
Processing/ Recycling	Recycling	Section 2.4.1.26 – Waste Handling, Disposal, Treatment, and Recycling and Section 4.2.2.23 - Waste Handling, Disposal, Treatment, and Recycling for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	139	633	8.4E-6	1390 (APF 10)	6331 (APF 10)	8.4E-7 (APF 10)
					Central Tendency	628	2862	1.4E-6	6284 (APF 10)	28,624 (APF 10)	1.4E-7 (APF 10)
				Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)
					Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)
			ONUs	Inhalation 8 hr	High-End	139	633	8.4E-6	N/A	N/A	N/A
					Central Tendency	628	2862	1.4E-6	N/A	N/A	N/A
Distribution in commerce	Distribution	Activities related to distribution (e.g., loading, unloading) are considered throughout the life cycle, rather than using a single distribution scenario.									

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE			
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
Industrial use/ Solvents (for cleaning or degreasing)	Batch vapor degreaser (e.g., open-top, closed-loop)	Section 2.4.1.10 – Batch Open-Top Vapor Degreasing and Section 4.2.2.7 - Batch Open-Top Vapor Degreasing for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.16</b>	<b>0.71</b>	<b>7.5E-3</b>	<b>7.8</b> (APF 50)	<b>35</b> (APF 50)	<b>1.5E-4</b> (APF 50)	
					Central Tendency	<b>2.4</b>	<b>11</b>	<b>3.8E-4</b>	119 (APF 50)	542 (APF 50)	7.6E-6 (APF 50)	
				Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)	
					Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)	
			ONUs	Inhalation 8 hr	High-End	<b>0.96</b>	<b>4.4</b>	<b>1.2E-3</b>	N/A	N/A	N/A	
					Central Tendency	<b>8.3</b>	<b>38</b>	<b>1.1E-4</b>	N/A	N/A	N/A	
			Section 2.4.1.11 – Batch Closed-Loop Vapor Degreasing And Section 4.2.2.8 - Batch Closed-Loop Vapor Degreasing for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	20	<b>90</b>	5.9E-5	198 (APF 10)	238 (APF 10)	5.9E-6 (APF 10)
						Central Tendency	69	316	1.3E-5	693 (APF 10)	348 (APF 10)	1.3E-6 (APF 10)
	Dermal	High-End			<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)		
		Central Tendency			<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)		
	ONUs	Inhalation 8 hr		High-End	52	238	2.2E-5	N/A	N/A	N/A		
				Central Tendency	76	348	1.2E-5	N/A	N/A	N/A		
	In-line vapor degreaser (e.g., conveyorized, web cleaner)	Section 2.4.1.12– Conveyorized Vapor Degreasing and Section 4.2.2.9 - Conveyorized Vapor Degreasing for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.03</b>	<b>0.12</b>	<b>3.5E-2</b>	<b>1.3</b> (APF 50)	<b>6.1</b> (APF 50)	<b>7.0E-4</b> (APF 50)	
					Central Tendency	<b>0.06</b>	<b>0.29</b>	<b>1.3E-2</b>	<b>3.2</b> (APF 50)	<b>15</b> (APF 50)	<b>2.7E-4</b> (APF 50)	
Dermal				High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)		
				Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)		
ONUs				High-End	<b>0.04</b>	<b>0.18</b>	<b>2.3E-2</b>	N/A	N/A	N/A		

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE		
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )
				Inhalation 8 hr	Central Tendency	0.12	0.56	7.0E-3	N/A	N/A	N/A
		Section 2.4.1.13 - Web Degreasing and Section 4.2.2.10 - Web Degreasing for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	2.8	13	3.3E-4	139 (APF 10)	126 (APF 10)	3.3E-05 (APF 10)
Central Tendency	8.2				37	1.1E-4	409 (APF 10)	373 (APF 10)	1.1E-05 (APF 10)		
Dermal	High-End			1.2	2.6	2.5E-3	24 (PF 20)	51 (PF 20)	1.2E-4 (PF 20)		
	Central Tendency			3.6	7.7	6.4E-4	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)		
ONUs	Inhalation 8 hr		High-End	4.3	19	2.1E-4	N/A	N/A	N/A		
			Central Tendency	16	71	5.5E-5	N/A	N/A	N/A		
Cold cleaner	Section 2.4.1.14– Cold Cleaning and Section 4.2.2.11 - Cold Cleaning Based on inhalation* exposure monitoring data for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	1.2	5.5	9.7E-4	12 (APF 10)	138 (APF 25)	9.7E-5 (APF 10)	
				Central Tendency	3.6	16	2.5E-4	36 (APF 10)	407 (APF 25)	2.4E-05 (APF 10)	
			Dermal	High-End	1.2	2.6	2.5E-3	24 (PF 20)	51 (PF 20)	1.2E-4 (PF 20)	
				Central Tendency	3.6	7.7	6.4E-4	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)	
		ONUs	Inhalation 8 hr	High-End	1.2	5.5	9.7E-4	N/A	N/A	N/A	
				Central Tendency	3.6	16	2.5E-4	N/A	N/A	N/A	
		Worker	Section 2.4.1.14– Cold Cleaning and Section 4.2.2.11 - Cold Cleaning Based on inhalation* exposure modeling for inhalation risks and Section 4.2.3 for dermal risks	Inhalation 8 hr	High-End	3.3	15	2.6E-4	33 (APF 10)	148 (APF 10)	2.6E-5 (APF 10)
					Central Tendency	2086	9501	4.1E-7	20857 (APF 10)	95,007 (APF 10)	4.1E-8 (APF 10)
				Dermal	High-End	1.2	2.6	2.5E-3	24 (PF 20)	51 (PF 20)	1.2E-4 (PF 20)
					Central Tendency	3.6	7.7	6.4E-4	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)



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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE				
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )		
			ONUs	Inhalation 8 hr	High-End	<b>6.4</b>	<b>29</b>	<b>1.3E-4</b>	N/A	N/A	N/A		
					Central Tendency	4029	18,354	2.1E-7	N/A	N/A	N/A		
	Aerosol spray degreaser/cleaner	Section 2.4.1.15– Aerosol Degreasing and Aerosol Lubricants and Section 4.2.2.12 - Aerosol Degreasing and Aerosol Lubricants <sup>c</sup> Based on inhalation* exposure monitoring data for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.64</b>	<b>2.9</b>	<b>1.8E-3</b>	32 (APF 50)	146 (APF 50)	3.6E-5 (APF 50)		
						Central Tendency	<b>3.5</b>	<b>16</b>	<b>2.6E-4</b>	174 (APF 50)	792 (APF 50)	5.2E-6 (APF 50)	
					Dermal	High-End	<b>0.80</b>	<b>1.7</b>	<b>3.7E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>1.9E-4</b> (PF 20)	
						Central Tendency	<b>2.4</b>	<b>5.1</b>	<b>9.6E-4</b>	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)	
				ONUs	Inhalation 8 hr	High-End	<b>0.64</b>	<b>2.9</b>	<b>1.8E-3</b>	N/A	N/A	N/A	
						Central Tendency	<b>3.5</b>	<b>16</b>	<b>2.6E-4</b>	N/A	N/A	N/A	
			Section 2.4.1.15 - Aerosol Degreasing and Aerosol Lubricants and Section 4.2.2.12 - Aerosol Degreasing and Aerosol Lubricants <sup>c</sup> Based on inhalation* exposure modeling for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.29</b>	<b>1.3</b>	<b>3.1E-3</b>	15 (APF 50)	<b>66</b> (APF 50)	6.3E-5 (APF 50)	
							Central Tendency	<b>0.91</b>	<b>4.2</b>	<b>9.4E-4</b>	46 (APF 50)	208 (APF 50)	1.9E-5 (APF 50)
						Dermal	High-End	<b>0.80</b>	<b>1.7</b>	<b>3.7E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>1.9E-4</b> (PF 20)
							Central Tendency	<b>2.4</b>	<b>5.1</b>	<b>9.6E-4</b>	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)
				ONUs	Inhalation 8 hr	High-End	<b>6.8</b>	<b>31</b>	<b>1.4E-4</b>	N/A	N/A	N/A	
						Central Tendency	50	260	2.0E-5	N/A	N/A	N/A	
	Dry cleaning solvent	Section 2.4.1.16 – Dry Cleaning and Spot Cleaning Post-2006 Dry Cleaning (including spot cleaning) and Section 4.2.2.13 - Dry Cleaning and Spot Cleaning <sup>c</sup>	Worker	Inhalation 8 hr	High-End	<b>0.26</b>	<b>1.0</b>	<b>5.4E-3</b>	13 (APF 50)	<b>50</b> (APF 50)	<b>1.1E-4</b> (APF 50)		
	Spot cleaner					Central Tendency	<b>1.4</b>	<b>6.1</b>	<b>6.8E-4</b>	69 (APF 50)	303 (APF 50)	1.4E-5 (APF 50)	
					Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)	

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE			
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
		Based on inhalation* exposure monitoring data for inhalation risks and Section 4.2.3 for dermal risks	ONUs	Inhalation 8 hr	Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
					High-End	14	<b>56</b>	9.5E-5	N/A	N/A	N/A	
					Central Tendency		<b>64</b>	6.5E-5	N/A	N/A	N/A	
		Section 2.4.1.16– Dry Cleaning and Spot Cleaning Post-2006 Dry Cleaning (including spot cleaning) and Section 4.2.2.13 - Dry Cleaning and Spot Cleaning ° Based on inhalation* exposure modeling for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.17</b>	<b>0.50</b>	<b>8.1E-2</b>	<b>8.4</b> (APF 50)	<b>25</b> (APF 50)	<b>1.6E-4</b> (APF 50)	
					Central Tendency	<b>3.6</b>	<b>11</b>	<b>3.8E-4</b>	179 (APF 50)	527 (APF 50)	7.6E-6 (APF 50)	
				Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)	
					Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
				ONUs	Inhalation 8 hr	High-End	<b>3.2</b>	<b>9.5</b>	<b>4.3E-4</b>	N/A	N/A	N/A
						Central Tendency	46	136	2.9E-5	N/A	N/A	N/A
		Section 2.4.1.16– Dry Cleaning and Spot Cleaning 4th/5th Gen Only Dry Cleaning (including spot cleaning) and Section 4.2.2.13 - Dry Cleaning and Spot Cleaning ° Based on inhalation* exposure monitoring data for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.89</b>	<b>3.5</b>	<b>1.5E-3</b>	45 (APF 50)	174 (APF 50)	3.1E-5 (APF 50)	
					Central Tendency	<b>5.1</b>	<b>23</b>	<b>1.8E-4</b>	256 (APF 50)	1129 (APF 50)	3.7E-6 (APF 50)	
				Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)	
					Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
				ONUs	Inhalation 8 hr	High-End	41	158	3.4E-5	N/A	N/A	N/A
Central Tendency	358					1582	2.6E-6	N/A	N/A	N/A		
Industrial use/ Lubricants and greases	Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)	Section 2.4.1.15 - Aerosol Degreasing and Aerosol Lubricants	Worker	Inhalation 8 hr	High-End	<b>0.64</b>	<b>2.9</b>	<b>1.8E-3</b>	32 (APF 50)	146 (APF 50)	3.6E-5 (APF 50)	
					Central Tendency	<b>3.5</b>	<b>16</b>	<b>2.6E-4</b>	174 (APF 50)	792 (APF 50)	5.2E-6 (APF 50)	

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE		
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )
		and Section 4.2.2.12 - Aerosol Degreasing and Aerosol Lubricants <sup>c</sup> Based on inhalation* exposure monitoring data for inhalation risks and Section 4.2.3 for dermal risks	ONUs	Dermal	High-End	<b>0.80</b>	<b>1.7</b>	<b>3.7E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>1.9E-4</b> (PF 20)
					Central Tendency	<b>2.4</b>	<b>5.1</b>	<b>9.6E-4</b>	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)
				Inhalation 8 hr	High-End	<b>0.64</b>	<b>2.9</b>	<b>1.8E-3</b>	N/A	N/A	N/A
					Central Tendency	<b>3.5</b>	<b>16</b>	<b>2.6E-4</b>	N/A	N/A	N/A
			Worker	Inhalation 8 hr	High-End	<b>0.29</b>	<b>1.3</b>	<b>3.1E-3</b>	15 (APF 50)	<b>66</b> (APF 50)	6.3E-5 (APF 50)
					Central Tendency	<b>0.91</b>	<b>4.2</b>	<b>9.4E-4</b>	46 (APF 50)	208 (APF 50)	1.9E-5 (APF 50)
				Dermal	High-End	<b>0.80</b>	<b>1.7</b>	<b>3.7E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>1.9E-4</b> (PF 20)
					Central Tendency	<b>2.4</b>	<b>5.1</b>	<b>9.6E-4</b>	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)
		ONUs	Inhalation 8 hr	High-End	<b>6.8</b>	<b>31</b>	<b>1.4E-4</b>	N/A	N/A	N/A	
		Section 2.4.1.20– Metalworking Fluids and Section 4.2.2.17 - Metalworking Fluids <sup>c</sup> for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	239	1087	4.9E-6	2387 (APF 10)	10,875 (APF 10)	4.9E-7 (APF 10)
					Central Tendency	869	3960	1.0E-6	8692 (APF 10)	39,595 (APF 10)	1.0E-7 (APF 10)
				Dermal	High-End	12	<b>26</b>	<b>2.5E-4</b>	60 (PF 5)	128 (PF 5)	5.0E-5 (PF 5)
					Central Tendency	36	<b>77</b>	6.4E-5	181 (PF 5)	384 (PF 5)	1.3E-5 (PF 5)
			ONUs	Inhalation 8 hr	High-End	239	1087	4.9E-6	N/A	N/A	N/A
Central Tendency	869				3960	1.0E-6	N/A	N/A	N/A		
Solvent-based adhesives and sealants	Section 2.4.1.17– Adhesive, Sealants, Paints, and		Worker	Inhalation 8 hr	High-End	<b>6.2</b>	<b>28</b>	<b>1.9E-4</b>	62 (APF 10)	281 (APF 10)	1.9E-5 (APF 10)

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE			
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
Industrial use/ Adhesives and sealants		Coatings and Section 4.2.2.14 Adhesives, Sealants, Paints, and Coatings Based on Adhesives for inhalation risks and Section 4.2.3 for dermal risks			Central Tendency	57	257	1.6E-5	565 (APF 10)	2574 (APF 10)	1.6E-6 (APF 10)	
					Dermal Commercial use	High-End	<b>0.98</b>	<b>2.1</b>	<b>3.0E-3</b>	20 (PF 20)	<b>42</b> (PF 20)	<b>1.5E-4</b> (PF 20)
						Central Tendency	<b>3.0</b>	<b>6.3</b>	<b>7.8E-4</b>	59 (PF 20)	126 (PF 20)	3.9E-5 (PF 20)
					Dermal Industrial use	High-End	<b>1.5</b>	<b>3.2</b>	<b>2.0E-3</b>	30 (PF 20)	<b>64</b> (PF 20)	9.9E-5 (PF 20)
						Central Tendency	<b>4.5</b>	<b>9.6</b>	<b>5.1E-4</b>	90 (PF 20)	192 (PF 20)	2.6E-5 (PF 20)
					ONUs	Inhalation 8 hr	High-End	<b>6.2</b>	<b>28</b>	<b>1.9E-4</b>	N/A	N/A
Central Tendency	57	257	1.6E-5	N/A			N/A	N/A				
Industrial use/ Paints and coatings including paint and coating removers	Solvent-based paints and coatings, including for chemical milling	Section 2.4.1.17– Adhesive, Sealants, Paints, and Coatings and Section 4.2.2.14 Adhesives, Sealants, Paints, and Coatings Based on Paints/ Coatings for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>1.1</b>	<b>5.0</b>	<b>1.1E-3</b>	11 (APF 10)	125 (APF 25)	4.3E-5 (APF 25)	
					Central Tendency	21	<b>98</b>	4.2E-5	214 (APF 10)	2440 (APF 25)	1.7E-6 (APF 25)	
				Dermal Commercial use	High-End	<b>0.98</b>	<b>2.1</b>	<b>3.0E-3</b>	20 (PF 20)	<b>42</b> (PF 20)	<b>1.5E-4</b> (PF 20)	
					Central Tendency	<b>3.0</b>	<b>6.3</b>	<b>7.8E-4</b>	59 (PF 20)	126 (PF 20)	3.9E-5 (PF 20)	
				Dermal Industrial use	High-End	<b>1.5</b>	<b>3.2</b>	<b>2.0E-3</b>	30 (PF 20)	<b>64</b> (PF 20)	9.9E-5 (PF 20)	
					Central Tendency	<b>4.5</b>	<b>9.6</b>	<b>5.1E-4</b>	90 (PF 20)	192 (PF 20)	2.6E-5 (PF 20)	
				ONUs	Inhalation 8 hr	High-End	<b>1.1</b>	<b>5.0</b>	<b>1.1E-3</b>	N/A	N/A	N/A
						Central Tendency	21	<b>98</b>	4.2E-5	N/A	N/A	N/A
				Worker	Inhalation 8 hr	High-End	<b>2.4</b>	<b>11</b>	<b>4.9E-4</b>	24 (APF 10)	108 (APF 10)	4.9E-5 (APF 10)
						Central Tendency	<b>4.1</b>	<b>19</b>	<b>2.2E-4</b>	41 (APF 10)	188 (APF 10)	2.2E-5 (APF 10)
		Section 2.4.1.18 – Maskant for Chemical Milling and Section 4.2.2.15 - Maskant for Chemical										

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE		
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )
		Milling for inhalation risks and Section 4.2.3 for dermal risks		Dermal	High-End	1.2	2.6	2.5E-3	24 (PF 20)	51 (PF 20)	1.2E-4 (PF 20)
					Central Tendency	3.6	7.7	6.4E-4	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)
			ONUs	Inhalation 8 hr	High-End	2.4	11	4.9E-4	N/A	N/A	N/A
					Central Tendency	4.1	19	2.2E-4	N/A	N/A	N/A
Industrial use/ Processing aids, not otherwise listed	Pesticide, fertilizer and other agricultural chemical manufacturing	Section 2.4.1.19 – Industrial Processing Aid And Section 4.2.2.16 - Industrial Processing Aid for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	4.2	19	2.8E-4	42 (APF 10)	193 (APF 10)	2.8E-5 (APF 10)
					Central Tendency	83	380	1.1E-5	833 (APF 10)	3796 (APF 10)	1.1E-6 (APF 10)
				Dermal	High-End	1.2	2.6	2.5E-3	24 (PF 20)	51 (PF 20)	1.2E-4 (PF 20)
					Central Tendency	3.6	7.7	6.4E-4	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)
			ONUs	Inhalation 8 hr	High-End	4.2	19	2.8E-4	N/A	N/A	N/A
					Central Tendency	83	380	1.1E-5	N/A	N/A	N/A
Industrial use/ Processing aids, specific to petroleum production	Catalyst regeneration in petrochemical manufacturing	Section 2.4.1.19 – Industrial Processing Aid And Section 4.2.2.16 - Industrial Processing Aid for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	4.2	19	2.8E-4	42 (APF 10)	193 (APF 10)	2.8E-5 (APF 10)
					Central Tendency	83	380	1.1E-5	833 (APF 10)	3796 (APF 10)	1.1E-6 (APF 10)
				Dermal	High-End	1.2	2.6	2.5E-3	24 (PF 20)	51 (PF 20)	1.2E-4 (PF 20)
					Central Tendency	3.6	7.7	6.4E-4	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)
			ONUs	Inhalation 8 hr	High-End	4.2	19	2.8E-4	N/A	N/A	N/A
					Central Tendency	83	380	1.1E-5	N/A	N/A	N/A
Industrial use/ Other uses	Textile processing	Section 2.4.1.22 – Other Spot Cleaning/Spot	Worker	Inhalation 8 hr	High-End	22	99	5.4E-5	217 (APF 10)	987 (APF 10)	5.4E-6 (APF 10)

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						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
		Removers (Including Carpet Cleaning) and Section 4.2.2.19 - Other Spot Cleaning/Spot Removers (Including Carpet Cleaning) ° for inhalation risks and Section 4.2.3 for dermal risks		Central Tendency		29	133	3.1E-5	291 (APF 10)	1325 (APF 10)	3.1E-6 (APF 10)	
					Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)
				Central Tendency		<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
				ONUs	Inhalation 8 hr	High-End			7.0E-6			
						Central Tendency	167	759	5.4E-6	N/A	N/A	N/A
				Worker	Inhalation 8 hr	High-End	139	633	8.4E-6	1390 (APF 10)	6331 (APF 10)	8.4E-7 (APF 10)
			Central Tendency			628	2862	1.4E-6	6284 (APF 10)	28,624 (APF 10)	1.4E-7 (APF 10)	
			Dermal		High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)	
					Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)	
			ONUs	Inhalation 8 hr	High-End	139	633	8.4E-6	N/A	N/A	N/A	
	Central Tendency	628			2862	1.4E-6	N/A	N/A	N/A			
	Wood furniture manufacturing	Section 2.4.1.23 – Other Industrial Uses and Section 4.2.2.20 - Other Industrial Uses for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	139	633	8.4E-6	1390 (APF 10)	6331 (APF 10)	8.4E-7 (APF 10)	
					Central Tendency	628	2862	1.4E-6	6284 (APF 10)	28,624 (APF 10)	1.4E-7 (APF 10)	
				Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)	
Central Tendency					<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)		
ONUs			Inhalation 8 hr	High-End	139	633	8.4E-6	N/A	N/A	N/A		
				Central Tendency	628	2862	1.4E-6	N/A	N/A	N/A		

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE					
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )			
	Laboratory chemicals	Section 2.4.1.25 – Laboratory Chemicals	N/A – qualitative assessment											
	Foundry applications	Section 2.4.1.23 – Other Industrial Uses and Section 4.2.2.20 - Other Industrial Uses for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	139	633	8.4E-6	1390 (APF 10)	6331 (APF 10)	8.4E-7 (APF 10)			
Central Tendency					628	2862	1.4E-6	6284 (APF 10)	28,624 (APF 10)	1.4E-7 (APF 10)				
Dermal				High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> (PF 20)	<b>1.2E-4</b> (PF 20)				
				Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20)	154 (PF 20)	3.2E-5 (PF 20)				
ONUs			Inhalation 8 hr	High-End	139	633	8.4E-6	N/A	N/A	N/A				
				Central Tendency	628	2862	1.4E-6	N/A	N/A	N/A				
Commercial use/ Cleaning and furniture care products	Cleaners and degreasers (other)	Section 2.4.1.21 – Wipe Cleaning and Metal/Stone Polishes and Section 4.2.2.18 - Wipe Cleaning and Metal/Stone Polishes <sup>c</sup> for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.02</b>	<b>0.10</b>	<b>5.3E-2</b>	<b>1.1</b> (APF 50)	<b>5.0</b> (APF 50)	<b>1.1E-3</b> (APF 50)			
					Central Tendency	<b>0.04</b>	<b>0.17</b>	<b>2.4E-2</b>	<b>1.9</b> (APF 50)	<b>8.6</b> (APF 50)	<b>4.8E-4</b> (APF 50)			
				Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)			
					Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)			
			ONUs	Inhalation 8 hr	High-End	<b>0.22</b>	<b>0.98</b>	<b>5.4E-3</b>	N/A	N/A	N/A			
					Central Tendency	229	1043	4.0E-6	N/A	N/A	N/A			
					Section 2.4.1.22 – Other Spot Cleaning/Spot Removers (Including Carpet Cleaning) and Section 4.2.2.19 - Other Spot Cleaning/Spot Removers (Including Carpet Cleaning) <sup>c</sup> for inhalation	Worker	Inhalation 8 hr	High-End	22	<b>99</b>	5.4E-5	217 (APF 10)	987 (APF 10)	5.4E-6 (APF 10)
								Central Tendency	29	133	3.1E-5	291 (APF 10)	1325 (APF 10)	3.1E-6 (APF 10)
							Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)
								Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE			
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
		risks and Section 4.2.3 for dermal risks	ONUs	Inhalation 8 hr	High-End	167	759	7.0E-6	N/A	N/A	N/A	
					Central Tendency			5.4E-6				
		Section 2.4.1.24 – Other Commercial Uses and Section 4.2.2.21 - Other Commercial Uses Based on Mold Release ° for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr		High-End	25	114	4.7E-5	250 (APF 10)	1139 (APF 10)	4.7E-6 (APF 10)
						Central Tendency	50	228	1.8E-5	500 (APF 10)	2278 (APF 10)	1.8E-6 (APF 10)
				Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)	
					Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
	ONUs	Inhalation 8 hr		High-End	25	114	4.7E-5	N/A	N/A	N/A		
				Central Tendency	50	228	1.8E-5	N/A	N/A	N/A		
	Dry cleaning solvent	Section 2.4.1.16 – Dry Cleaning and Spot Cleaning	Worker	Inhalation 8 hr	High-End	<b>0.26</b>	<b>1.0</b>	<b>5.4E-3</b>	13 (APF 50)	<b>50</b> (APF 50)	<b>1.1E-4</b> (APF 50)	
	Spot cleaner	Post-2006 Dry Cleaning (including spot cleaning) and Section 4.2.2.13 - Dry Cleaning and Spot Cleaning ° Based on inhalation* exposure monitoring data for inhalation risks and Section 4.2.3 for dermal risks			Central Tendency	<b>1.4</b>	<b>6.1</b>	<b>6.8E-4</b>	69 (APF 50)	303 (APF 50)	1.4E-5 (APF 50)	
				Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)	
					Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
ONUs				Inhalation 8 hr		High-End	14		56	9.5E-5	N/A	N/A
	Central Tendency	64				6.5E-5				N/A	N/A	N/A
Section 2.4.1.16 – Dry Cleaning and Spot Cleaning	Worker	Inhalation 8 hr	High-End	<b>0.17</b>	<b>0.50</b>	<b>8.1E-2</b>	<b>8.4</b> (APF 50)	<b>25</b> (APF 50)	<b>1.6E-4</b> (APF 50)			



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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE		
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )
		Post-2006 Dry Cleaning (including spot cleaning) and Section 4.2.2.13 - Dry Cleaning and Spot Cleaning <sup>c</sup> Based on inhalation* exposure modeling for inhalation risks and Section 4.2.3 for dermal risks	ONUs	Central Tendency		<b>3.6</b>	<b>11</b>	<b>3.8E-4</b>	179 (APF 50)	527 (APF 50)	7.6E-6 (APF 50)
					Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)
				Central Tendency		<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)
				Inhalation 8 hr	High-End	<b>3.2</b>	<b>9.5</b>	<b>4.3E-4</b>	N/A	N/A	N/A
					Central Tendency	46	136	2.9E-5	N/A	N/A	N/A
				Worker	Inhalation 8 hr	High-End	<b>0.89</b>	<b>3.5</b>	<b>1.5E-3</b>	45 (APF 50)	174 (APF 50)
			Central Tendency			<b>5.1</b>	<b>23</b>	<b>1.8E-4</b>	256 (APF 50)	1129 (APF 50)	3.7E-6 (APF 50)
			Dermal		High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)
					Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)
			ONUs	Inhalation 8 hr	High-End	41	158	3.4E-5	N/A	N/A	N/A
	Central Tendency	358			1582	2.6E-6	N/A	N/A	N/A		
	Automotive care products (e.g., engine degreaser and brake cleaner) Aerosol cleaner	Section 2.4.1.15 – Aerosol Degreasing and Aerosol Lubricants and Section 4.2.2.12 - Aerosol Degreasing and Aerosol Lubricants <sup>c</sup> Based on inhalation* exposure monitoring data for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.64</b>	<b>2.9</b>	<b>1.8E-3</b>	32 (APF 50)	146 (APF 50)	3.6E-5 (APF 50)
					Central Tendency	<b>3.5</b>	<b>16</b>	<b>2.6E-4</b>	174 (APF 50)	792 (APF 50)	5.2E-6 (APF 50)
				Dermal	High-End	<b>0.80</b>	<b>1.7</b>	<b>3.7E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>1.9E-4</b> (PF 20)
Central Tendency					<b>2.4</b>	<b>5.1</b>	<b>9.6E-4</b>	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)	
ONUs				High-End	<b>0.64</b>	<b>2.9</b>	<b>1.8E-3</b>	N/A	N/A	N/A	

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE				
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )		
				Inhalation 8 hr	Central Tendency	3.5	16	2.6E-4	N/A	N/A	N/A		
		Section 2.4.1.15– Aerosol Degreasing and Aerosol Lubricants and Section 4.2.2.12 - Aerosol Degreasing and Aerosol Lubricants <sup>c</sup> Based on inhalation* exposure modeling for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	0.29	1.3	3.1E-3	15 (APF 50)	66 (APF 50)	6.3E-5 (APF 50)		
Central Tendency	0.91				4.2	9.4E-4	46 (APF 50)	208 (APF 50)	1.9E-5 (APF 50)				
Dermal	High-End			0.80	1.7	3.7E-3	16 (PF 20)	34 (PF 20)	1.9E-4 (PF 20)				
	Central Tendency			2.4	5.1	9.6E-4	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)				
ONUs	Inhalation 8 hr		High-End	6.8	31	1.4E-4	N/A	N/A	N/A				
			Central Tendency	50	260	2.0E-5	N/A	N/A	N/A				
	Non-aerosol cleaner	Section 2.4.1.21 – Wipe Cleaning and Metal/Stone Polishes and Section 4.2.2.18 Wipe Cleaning and Metal/Stone Polishes <sup>c</sup> for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	0.02	0.10	5.3E-2	1.1 (APF 50)	5.0 (APF 50)	1.1E-3 (APF 50)		
Central Tendency					0.04	0.17	2.4E-2	1.9 (APF 50)	8.6 (APF 50)	4.8E-4 (APF 50)			
Dermal				High-End	0.79	1.7	4.4E-3	16 (PF 20)	34 (PF 20)	2.2E-4 (PF 20)			
				Central Tendency	2.4	5.0	1.0E-3	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)			
ONUs			Inhalation 8 hr	High-End	0.22	0.98	5.4E-3	N/A	N/A	N/A			
				Central Tendency	229	1043	4.0E-6	N/A	N/A	N/A			
Commercial use/ Lubricants and greases			Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)	Section 2.4.1.15 – Aerosol Degreasing and Aerosol Lubricants and Section 4.2.2.12 - Aerosol Degreasing and Aerosol Lubricants <sup>c</sup> Based on inhalation* exposure monitoring data for	Worker	Inhalation 8 hr	High-End	0.64	2.9	1.8E-3	32 (APF 50)	146 (APF 50)	3.6E-5 (APF 50)
							Central Tendency	3.5	16	2.6E-4	174 (APF 50)	792 (APF 50)	5.2E-6 (APF 50)
	Dermal	High-End				0.80	1.7	3.7E-3	16 (PF 20)	34 (PF 20)	1.9E-4 (PF 20)		
		Central Tendency				2.4	5.1	9.6E-4	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)		

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE			
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
		inhalation risks and Section 4.2.3 for dermal risks	ONUs	Inhalation 8 hr	High-End	<b>0.64</b>	<b>2.9</b>	<b>1.8E-3</b>	N/A	N/A	N/A	
					Central Tendency	<b>3.5</b>	<b>16</b>	<b>2.6E-4</b>	N/A	N/A	N/A	
		Section 2.4.1.15 – Aerosol Degreasing and Aerosol Lubricants and Section 4.2.2.12 - Aerosol Degreasing and Aerosol Lubricants <sup>c</sup> Based on inhalation* exposure modeling for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.29</b>	<b>1.3</b>	<b>3.1E-3</b>	15 (APF 50)	<b>66</b> (APF 50)	6.3E-5 (APF 50)	
					Central Tendency	<b>0.91</b>	<b>4.2</b>	<b>9.4E-4</b>	46 (APF 50)	208 (APF 50)	1.9E-5 (APF 50)	
				Dermal	High-End	<b>0.80</b>	<b>1.7</b>	<b>3.7E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>1.9E-4</b> (PF 20)	
					Central Tendency	<b>2.4</b>	<b>5.1</b>	<b>9.6E-4</b>	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)	
		ONUs	Inhalation 8 hr	High-End	<b>6.8</b>	<b>31</b>	<b>1.4E-4</b>	N/A	N/A	N/A		
				Central Tendency	50	260	2.0E-5	N/A	N/A	N/A		
		Section 2.4.1.20 – Metalworking Fluids and Section 4.2.2.17 - Metalworking Fluids <sup>c</sup> for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	239	1087	4.9E-6	2387 (APF 10)	10,875 (APF 10)	4.9E-7 (APF 10)	
					Central Tendency	869	3960	1.0E-6	8692 (APF 10)	39,595 (APF 10)	1.0E-7 (APF 10)	
				Dermal	High-End	12	<b>26</b>	<b>2.5E-4</b>	60 (PF 5)	128 (PF 5)	5.0E-5 (PF 5)	
					Central Tendency	36	<b>77</b>	6.4E-5	181 (PF 5)	384 (PF 5)	1.3E-5 (PF 5)	
				ONUs	Inhalation 8 hr	High-End	239	1087	4.9E-6	N/A	N/A	N/A
						Central Tendency	869	3960	1.0E-6	N/A	N/A	N/A
Commercial use/ Adhesives and sealant chemicals	Light repair adhesives	Section 2.4.1.17 – Adhesive, Sealants, Paints, and Coatings and Section 4.2.2.14 Adhesives, Sealants, Paints, and Coatings	Worker	Inhalation 8 hr	High-End	<b>6.2</b>	<b>28</b>	<b>1.9E-4</b>	62 (APF 10)	281 (APF 10)	1.9E-5 (APF 10)	
					Central Tendency	57	257	1.6E-5	565 (APF 10)	2574 (APF 10)	1.6E-6 (APF 10)	
					High-End	<b>0.98</b>	<b>2.1</b>	<b>3.0E-3</b>	20 (PF 20)	<b>42</b> (PF 20)	<b>1.5E-4</b> (PF 20)	

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE						
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )				
		Based on Adhesives for inhalation risks and Section 4.2.3 for dermal risks		Dermal Commercial use	Central Tendency	<b>3.0</b>	<b>6.3</b>	<b>7.8E-4</b>	59 (PF 20)	126 (PF 20)	3.9E-5 (PF 20)				
					Dermal Industrial use	High-End	<b>1.5</b>	<b>3.2</b>	<b>2.0E-3</b>	30 (PF 20)	<b>64</b> (PF 20)	9.9E-5 (PF 20)			
				Central Tendency		<b>4.5</b>	<b>9.6</b>	<b>5.1E-4</b>	90 (PF 20)	192 (PF 20)	2.6E-5 (PF 20)				
				ONUs	Inhalation 8 hr	High-End	<b>6.2</b>	<b>28</b>	<b>1.9E-4</b>	N/A	N/A	N/A			
						Central Tendency	57	257	1.6E-5	N/A	N/A	N/A			
				Commercial use/ Paints and coatings	Solvent-based paints and coatings	Section 2.4.1.17– Adhesive, Sealants, Paints, and Coatings and Section 4.2.2.14 Adhesives, Sealants, Paints, and Coatings Based on Paints/ Coatings for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>1.1</b>	<b>5.0</b>	<b>1.1E-3</b>	11 (APF 10)	125 (APF 25)	4.3E-5 (APF 25)
Central Tendency	21	<b>98</b>	4.2E-5						214 (APF 10)	2440 (APF 25)	1.7E-6 (APF 25)				
Dermal Commercial use	High-End	<b>0.98</b>	<b>2.1</b>					<b>3.0E-3</b>	20 (PF 20)	<b>42</b> (PF 20)	<b>1.5E-4</b> (PF 20)				
	Central Tendency	<b>3.0</b>	<b>6.3</b>					<b>7.8E-4</b>	59 (PF 20)	126 (PF 20)	3.9E-5 (PF 20)				
Dermal Industrial use	High-End	<b>1.5</b>	<b>3.2</b>					<b>2.0E-3</b>	30 (PF 20)	<b>64</b> (PF 20)	9.9E-5 (PF 20)				
	Central Tendency	<b>4.5</b>	<b>9.6</b>					<b>5.1E-4</b>	90 (PF 20)	192 (PF 20)	2.6E-5 (PF 20)				
ONUs	Inhalation 8 hr	High-End	<b>1.1</b>					<b>5.0</b>	<b>1.1E-3</b>	N/A	N/A	N/A			
		Central Tendency	21					<b>98</b>	4.2E-5	N/A	N/A	N/A			
Commercial use/ Other uses	Carpet cleaning	Section 2.4.1.22– Other Spot Cleaning/Spot Removers (Including Carpet Cleaning) and Section 4.2.2.19 - Other Spot Cleaning/Spot Removers (Including Carpet	Worker					Inhalation 8 hr	High-End	22	<b>99</b>	5.4E-5	217 (APF 10)	987 (APF 10)	5.4E-6 (APF 10)
									Central Tendency	29	133	3.1E-5	291 (APF 10)	1325 (APF 10)	3.1E-6 (APF 10)
				Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)				

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE			
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
		Cleaning) ° for inhalation risks and Section 4.2.3 for dermal risks			Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
			ONUs	Inhalation 8 hr	High-End	167	759	7.0E-6	N/A	N/A	N/A	
					Central Tendency	5.4E-6	N/A	N/A	N/A			
	Laboratory chemicals	Section 2.4.1.25– Laboratory Chemicals	N/A – qualitative assessment									
	Metal (e.g., stainless steel) and stone polishes	Section 2.4.1.21– Wipe Cleaning and Metal/Stone Polishes and Section 4.2.2.18 - Wipe Cleaning and Metal/Stone Polishes ° for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.02</b>	<b>0.10</b>	<b>5.3E-2</b>	<b>1.1</b> (APF 50)	<b>5.0</b> (APF 50)	<b>1.1E-3</b> (APF 50)	
Central Tendency					<b>0.04</b>	<b>0.17</b>	<b>2.4E-2</b>	<b>1.9</b> (APF 50)	<b>8.6</b> (APF 50)	<b>4.8E-4</b> (APF 50)		
Dermal				High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)		
				Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)		
ONUs			Inhalation 8 hr	High-End	<b>0.22</b>	<b>0.98</b>	<b>5.4E-3</b>	N/A	N/A	N/A		
				Central Tendency	229	1043	4.0E-6	N/A	N/A	N/A		
Inks and ink removal products	Section 2.4.1.24– Other Commercial Uses and Section 4.2.2.21 - Other Commercial Uses Based on Printing ° for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.84</b>	<b>3.8</b>	<b>1.4E-3</b>	21 (APF 25)	192 (APF 50)	5.6E-5 (APF 25)		
				Central Tendency	<b>2.6</b>	<b>12</b>	<b>3.5E-4</b>	65 (APF 25)	594 (APF 50)	1.4E-5 (APF 25)		
			Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)		
				Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)		
		ONUs	Inhalation 8 hr	High-End	<b>0.84</b>	<b>3.8</b>	<b>1.4E-3</b>	N/A	N/A	N/A		
				Central Tendency	<b>2.6</b>	<b>12</b>	<b>3.5E-4</b>	N/A	N/A	N/A		
			Section 2.4.1.24– Other Commercial Uses	Worker	Inhalation 8 hr	High-End	10,000	45,552	1.17E-7	100,000 (APF 10)	455,520 (APF 10)	1.17E-8 (APF 10)

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE			
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
Welding	and Section 4.2.2.21 - Other Commercial Uses Based on Photocopying <sup>c</sup> for inhalation risks and Section 4.2.3 for dermal risks		ONUs	Inhalation 8 hr	High-End	10,000	45,552	1.17E-7	N/A	N/A	N/A	
					Central Tendency	26,667	121,472	3.40E-8	N/A	N/A	N/A	
				Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)	
					Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
			Section 2.4.1.15 – Aerosol Degreasing and Aerosol Lubricants and Section 4.2.2.12 - Aerosol Degreasing and Aerosol Lubricants <sup>c</sup> Based on inhalation* exposure monitoring data for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.64</b>	<b>2.9</b>	<b>1.8E-3</b>	32 (APF 50)	146 (APF 50)	3.6E-5 (APF 50)
						Central Tendency	<b>3.5</b>	<b>16</b>	<b>2.6E-4</b>	174 (APF 50)	792 (APF 50)	5.2E-6 (APF 50)
					Dermal	High-End	<b>0.80</b>	<b>1.7</b>	<b>3.7E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>1.9E-4</b> (PF 20)
						Central Tendency	<b>2.4</b>	<b>5.1</b>	<b>9.6E-4</b>	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)
	ONUs	Inhalation 8 hr		High-End	<b>0.64</b>	<b>2.9</b>	<b>1.8E-3</b>	N/A	N/A	N/A		
				Central Tendency	<b>3.5</b>	<b>16</b>	<b>2.6E-4</b>	N/A	N/A	N/A		
	Section 2.4.1.15– Aerosol Degreasing and Aerosol Lubricants and Section 4.2.2.12 - Aerosol Degreasing and Aerosol Lubricants <sup>c</sup> Based on inhalation* exposure modeling for inhalation risks and Section 4.2.3 for dermal risks	Worker		Inhalation 8 hr	High-End	<b>0.29</b>	<b>1.3</b>	<b>3.1E-3</b>	15 (APF 50)	<b>66</b> (APF 50)	6.3E-5 (APF 50)	
					Central Tendency	<b>0.91</b>	<b>4.2</b>	<b>9.4E-4</b>	46 (APF 50)	208 (APF 50)	1.9E-5 (APF 50)	
			Dermal	High-End	<b>0.80</b>	<b>1.7</b>	<b>3.7E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>1.9E-4</b> (PF 20)		
				Central Tendency	<b>2.4</b>	<b>5.1</b>	<b>9.6E-4</b>	48 (PF 20)	103 (PF 20)	4.8E-5 (PF 20)		
		ONUs	Inhalation 8 hr	High-End	<b>6.8</b>	<b>31</b>	<b>1.4E-4</b>	N/A	N/A	N/A		
				Central Tendency	50	260	2.0E-5	N/A	N/A	N/A		

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE			
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	
	Photographic film	Section 2.4.1.24 – Other Commercial Uses and Section 4.2.2.21 - Other Commercial Uses Based on Photographic Film ° for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	<b>0.089</b>	<b>0.40</b>	<b>1.3E-2</b>	<b>4.4</b> (APF 50)	<b>20</b> (APF 50)	<b>2.6E-4</b> (APF 50)	
					Central Tendency	<b>0.79</b>	<b>3.6</b>	<b>1.1E-3</b>	40 (APF 50)	181 (APF 50)	2.3E-5 (APF 50)	
				Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)	
					Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
			ONUs	Inhalation 8 hr	High-End	<b>0.089</b>	<b>0.40</b>	<b>1.3E-2</b>	N/A	N/A	N/A	
					Central Tendency	<b>0.79</b>	<b>3.6</b>	<b>1.1E-3</b>	N/A	N/A	N/A	
	Mold cleaning, release and protectant products	Section 2.4.1.24– Other Commercial Uses and Section 4.2.2.21 - Other Commercial Uses Based on Mold Release ° for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	25	114	4.7E-5	250 (APF10)	1139 (APF 10)	4.7E-6 (APF 10)	
					Central Tendency	50	228	1.8E-5	500 (APF10)	2278 (APF 10)	1.8E-6 (APF 10)	
				Dermal	High-End	<b>0.79</b>	<b>1.7</b>	<b>4.4E-3</b>	16 (PF 20)	<b>34</b> (PF 20)	<b>2.2E-4</b> (PF 20)	
					Central Tendency	<b>2.4</b>	<b>5.0</b>	<b>1.0E-3</b>	47 (PF 20)	101 (PF 20)	5.1E-5 (PF 20)	
ONUs			Inhalation 8 hr	High-End	25	114	4.7E-5	N/A	N/A	N/A		
				Central Tendency	50	228	1.8E-5	N/A	N/A	N/A		
Disposal/ Disposal	Industrial pre-treatment	Section 2.4.1.26– Waste Handling, Disposal, Treatment, and Recycling and Section 4.2.2.23 - Waste Handling, Disposal, Treatment, and Recycling for inhalation risks and Section 4.2.3 for dermal risks	Worker	Inhalation 8 hr	High-End	139	633	8.4E-6	1390 (APF 10)	6331 (APF 10)	8.4E-7 (APF 10)	
	Industrial wastewater treatment				Central Tendency	628	2862	1.4E-6	6284 (APF 10)	28,624 (APF 10)	1.4E-7 (APF 10)	
	Publicly owned treatment works (POTW)				Dermal	High-End	<b>1.2</b>	<b>2.6</b>	<b>2.5E-3</b>	24 (PF 20)	<b>51</b> <b>(PF 20)</b>	<b>1.2E-4</b> <b>(PF 20)</b>
	Underground injection					Central Tendency	<b>3.6</b>	<b>7.7</b>	<b>6.4E-4</b>	72 (PF 20))	154 (PF 20)	3.2E-5 (PF 20)
	Municipal landfill			ONUs	Inhalation 8 hr	High-End	25	114	4.7E-5	N/A	N/A	N/A
	Hazardous landfill					Central Tendency	50	228	1.8E-5	N/A	N/A	N/A
Other land disposal												

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Life Cycle Stage/ Category	Subcategory	Occupational Exposure Scenario and Exposure and Risk Section Numbers	Population	Exposure Route and Duration	Exposure Level	Risk Estimates for No PPE			Risk Estimates with PPE		
						Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )	Acute Non-cancer (benchmark MOE = 10)	Chronic Non-cancer (benchmark MOE = 100)	Cancer (benchmark = 10 <sup>-4</sup> )
	Municipal waste incinerator		ONUs	Inhalation 8 hr	High-End	139	633	8.4E-6	N/A	N/A	N/A
	Hazardous waste incinerator				Central Tendency	628	2862	1.4E-6	N/A	N/A	N/A
	Off-site waste transfer										

10099 N/A = not assessed because ONUs are not assumed to be wearing PPE

10100 \* exposure scenarios with both inhalation exposure monitoring data and inhalation exposure modeling present risk calculations for both exposure results, note that all dermal exposures were modeled

10102 <sup>a</sup> EPA assessed PCE as a reactant where it was produced as a byproduct from EDC manufacture and reused as a reactant

10103 <sup>b</sup> Identified welding products were anti-spatter aerosol products; therefore, the assessment is included with the assessment of other aerosol products.

10104 <sup>c</sup> EPA believes that small commercial facilities using PCE for aerosol degreasing and lubrication, dry cleaning, metalworking fluid, wipe cleaning, spot cleaning, or other commercial uses are unlikely to have a respiratory protection program. Therefore, the use of respirators is unlikely for workers in these facilities.



**4.5.2.2 Summary of Risk Estimates for Inhalation and Dermal Exposures to Consumers and Bystanders**

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Table 4-113 summarizes the risk estimates for inhalation and dermal exposures for all consumer exposure scenarios. Risk estimates that exceed the benchmark (i.e. MOEs less than the benchmark MOE) are highlighted by bolding the number and shading the cell. The risk characterization is described in more detail in Section 4.2.2 and specific links to the exposure and risk characterization sections are listed in Table 4-113 in the column headed Consumer Exposure Scenario.

Dermal risk estimates for all three consumer age groups (11-15 years, 16 – 20 years) and adults ( $\geq 21$ ) are presented for each exposure scenario in Section 4.2.4. Overall the differences in the MOEs between age groups are approximately 10% or less and none of the exposure scenarios have MOEs close enough to the benchmark MOE to result in different risk results depending on the age group selected. Table 4-113 presents dermal exposures for the most sensitive age group (11-15 years).

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**Table 4-113 Summary of Risk Estimates for CNS effects from Acute Inhalation and Dermal Exposures to Consumers by Conditions of Use**

Category	Sub Category	Consumer Exposure Scenario	Exposure Route and Duration	Scenario Description	User MOE (benchmark MOE = 10)	Bystander MOE (benchmark MOE = 10)	
Cleaning and furniture care products	Cleaners and degreasers (other)	Section 2.4.2.3.1- Aerosol Degreasers (includes: marine cleaner, degreaser, coil cleaner, electric motor cleaner, parts cleaner, cable cleaner, stainless steel polish, electrical/energized cleaner, wire and ignition demoisurants, electric motor cleaner; brake cleaners) Section 4.2.4.1 Aerosol Cleaners for Motors, Coils, Electrical Parts, Cables, Stainless Steel and marine Equipment, and Wire and Ignition Demoisturants	Inhalation 24-hr	Low Intensity User	7.7	39	
				Moderate Intensity User	0.2	0.8	
				High Intensity User	1.3E-02	5.2E-02	
			Dermal <sup>1</sup>	Low Intensity User	35	N/A	
				Moderate Intensity User	0.6	N/A	
				High Intensity User	5.8E-02	N/A	
	Dry cleaning solvent	Section 2.4.2.4.2 and Section 2.4.2.4.3- Dry Cleaned Articles Section 4.2.4.16 Dry Cleaned Clothing	Inhalation 24-hr	Stay-at-home Adult and Child		156	486
				Dermal <sup>1</sup>	Assumed dry cleaning Technology (Events, days after cleaning)	User, Half-Body MOE	User, Full-Body MOE
			2 <sup>nd</sup> and 3 <sup>rd</sup> generation (single, 1 day)		8.6	2.9	
			2 <sup>nd</sup> and 3 <sup>rd</sup> generation (single, 2 day)		11	3.7	
2 <sup>nd</sup> and 3 <sup>rd</sup> generation (single, 3 day)			15		4.9		
4 <sup>nd</sup> and 5 <sup>th</sup> generation (single, 1 day)			49		16		
4 <sup>nd</sup> and 5 <sup>th</sup> generation (single, 2 day)			64		21		
4 <sup>nd</sup> and 5 <sup>th</sup> generation (single, 3 day)			83		28		
4 <sup>nd</sup> and 5 <sup>th</sup> generation (repeat, 1 day)			16		5.2		
4 <sup>nd</sup> and 5 <sup>th</sup> generation (repeat, 2 day)			20	6.7			

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Category	Sub Category	Consumer Exposure Scenario	Exposure Route and Duration	Scenario Description	User MOE (benchmark MOE = 10)	Bystander MOE (benchmark MOE = 10)
				4 <sup>nd</sup> and 5th generation (repeat, 3 day)	26	8.7
	Automotive care products (e.g., engine degreaser and brake cleaner)	Section 2.4.2.3.1 - Brake Cleaner Section 4.2.4.2 Aerosol Brake Cleaners	Inhalation 24-hr	Low Intensity User	2.0	7.1
Moderate Intensity User				0.2	0.8	
High Intensity User				4.5E-02	0.2	
Dermal <sup>1</sup>			Low Intensity User	21	N/A	
			Moderate Intensity User	0.6	N/A	
			High Intensity User	7.1E-02	N/A	
Section 2.4.2.3.2 - Parts Cleaner Section 4.2.4.3 Parts Cleaners		Inhalation 24-hr	Low Intensity User	31	174	
			Moderate Intensity User	0.6	3.3	
			High Intensity User	7.1E-02	0.4	
		Dermal <sup>1</sup>	Low Intensity User	0.2	N/A	
			Moderate Intensity User	1.3E-02	N/A	
			High Intensity User	2.1E-02	N/A	
Aerosol cleaner	Section 2.4.2.3.3 - Vandalism Mark & Stain Remover, Mold Cleaner, Weld Splatter Protectant Section 4.2.4.4 Vandalism Stain Removers, Mold Cleaners, and Weld Splatter Protectants	Inhalation 24-hr	Low Intensity User	15	77	
			Moderate Intensity User	0.3	1.6	
			High Intensity User	1.3E-02	5.2E-02	
		Dermal <sup>1</sup>	Low Intensity User	N/E	N/A	
			Moderate Intensity User	N/E	N/A	
			High Intensity User	N/E	N/A	
Non-aerosol cleaner	Section 2.4.2.3.4 - Marble and Stone Polish (liquid) Section 4.2.4.5 Marble Polish	Inhalation 24-hr	Low Intensity User	3.3	17	
			Moderate Intensity User	6.8E-02	0.4	
			High Intensity User	1.2E-02	5.0E-02	
		Dermal <sup>1</sup>	Low Intensity User	3.5	N/A	
			Moderate Intensity User	5.4E-02	N/A	
			High Intensity User	5.8E-03	N/A	
		Section 2.4.2.3.5-Cutting Fluid	Inhalation 24-hr	Low Intensity User	8.1	39

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Category	Sub Category	Consumer Exposure Scenario	Exposure Route and Duration	Scenario Description	User MOE (benchmark MOE = 10)	Bystander MOE (benchmark MOE = 10)
Lubricants and greases	Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)	Section 4.2.4.6 Cutting Fluid		Moderate Intensity User	1.3	6.7
				High Intensity User	0.1	0.6
			Dermal <sup>1</sup>	Low Intensity User	N/E	N/A
				Moderate Intensity User	N/E	N/A
				High Intensity User	N/E	N/A
		Section 2.4.2.3.6- Spray Lubricant and Penetrating Oil Section 4.2.4.7 Lubricants and Penetrating Oils	Inhalation 24-hr	Low Intensity User	90	435
				Moderate Intensity User	1.4	7.3
				High Intensity User	8.0E-02	0.4
			Dermal <sup>1</sup>	Low Intensity User	N/E	N/A
				Moderate Intensity User	N/E	N/A
Adhesives and sealant chemicals	Adhesives for arts and crafts	Section 2.4.2.3.7-Adhesives (includes industrial adhesive, arts and crafts adhesive, gun ammunition sealant) Section 4.2.4.8 Adhesives	Inhalation 24-hr	Low Intensity User	62	29
				Moderate Intensity User	2.3	12
				High Intensity User	0.1	0.5
			Dermal <sup>1</sup>	Low Intensity User	N/E	N/A
				Moderate Intensity User	N/E	N/A
		High Intensity User		N/E	N/A	
		Section 2.4.2.3.8-Livestock Grooming Adhesive Section 4.2.4.9 Livestock Grooming Adhesive	Inhalation 24-hr	Low Intensity User	112	539
				Moderate Intensity User	12	64
				High Intensity User	0.8	3.0
			Dermal <sup>1</sup>	Low Intensity User	N/E	N/A
	Moderate Intensity User			N/E	N/A	
	Light repair adhesives	Section 2.4.2.3.9-Column Adhesive, Caulk and Sealant Section 4.2.4.10 Caulks, Sealants and Column Adhesives	Inhalation 24-hr	Low Intensity User	192	N/E
				Moderate Intensity User	2.3	N/E
				High Intensity User	7.2E-02	N/E
Dermal <sup>1</sup>			Low Intensity User	N/E	N/A	

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Category	Sub Category	Consumer Exposure Scenario	Exposure Route and Duration	Scenario Description	User MOE (benchmark MOE = 10)	Bystander MOE (benchmark MOE = 10)
				Moderate Intensity User	N/E	N/A
				High Intensity User	N/E	N/A
Paints and coatings	Solvent-based paints and coatings	Section 2.4.2.3.10-Outdoor Water Shield (liquid) Section 4.2.4.11 Outdoor Water Shield	Inhalation 24-hr	Low Intensity User	7.6	29
				Moderate Intensity User	1.1	3.3
				High Intensity User	8.9E-02	0.4
			Dermal <sup>1</sup>	Low Intensity User	0.1	N/A
				Moderate Intensity User	2.5E-02	N/A
				High Intensity User	5.0E-02	N/A
		Section 2.4.2.3.11 - Coatings and primers (aerosol) Section 4.2.4.12 Aerosol Coatings and Primers	Inhalation 24-hr	Low Intensity User	522	13448
				Moderate Intensity User	62	2143
				High Intensity User	5.9	209
			Dermal <sup>1</sup>	Low Intensity User	N/E	N/A
				Moderate Intensity User	N/E	N/A
				High Intensity User	N/E	N/A
		Section 2.4.2.3.12 - Rust Primer and Sealant (liquid) Section 4.2.4.13 Liquid Primers and Sealants	Inhalation 24-hr	Low Intensity User	10600	128556
				Moderate Intensity User	1163	12434
				High Intensity User	36	229
			Dermal <sup>1</sup>	Low Intensity User	1.4	N/A
				Moderate Intensity User	1.8E-02	N/A
				High Intensity User	1.6E-02	N/A
		Section 2.4.2.3.13-Metallic Overglaze Section 4.2.4.14 Metallic Overglaze	Inhalation 24-hr	Low Intensity User	4372	21107
				Moderate Intensity User	337	1674
High Intensity User	21			81		
Dermal <sup>1</sup>	Low Intensity User		N/E	N/A		
	Moderate Intensity User		N/E	N/A		
	High Intensity User		N/E	N/A		
Other Uses			Inhalation 24-hr	Low Intensity User	1.1	5.3

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Category	Sub Category	Consumer Exposure Scenario	Exposure Route and Duration	Scenario Description	User MOE (benchmark MOE = 10)	Bystander MOE (benchmark MOE = 10)
	Metal (e.g., stainless steel) and stone polishes	Section 2.4.2.3.14-Marble and Stone Polish (wax) Section 4.2.4.15 Metal and Stone Polish	Dermal <sup>1</sup>	Moderate Intensity User	0.2	0.8
				High Intensity User	1.5E-02	6.1E-02
				Low Intensity User	1.0	N/A
				Moderate Intensity User	0.1	N/A
				High Intensity User	1.3E-02	N/A
	Inks and ink removal products	Ink removal combined under Aerosol Cleaner (vandalism and stain remover); use in printing inks discussed as “other use”				
	Welding	Identified welding products were anti-spatter aerosol products; therefore, the assessment is included with the assessment of other aerosol products combined under Aerosol Cleaner (weld splatter protectant)				
	Mold cleaning, release and protectant products	Combined under Aerosol Cleaner (mold cleaner)				

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<sup>1</sup> Dermal exposure presented here are the youth age group (11-15 years). Three age groups are presented for each COU in section 4.2.4. Overall the differences in the MOEs between age groups are approximately 10% or less.  
N/A = not assessed because bystanders are assumed to not have dermal contact with liquid PCE  
N/E = not evaluated because dermal exposures to consumers are not expected for these uses because for the caulks, sealants and column adhesives consumer use the area of use was assumed to be outdoors, so bystander exposure was not estimated.

## 5 RISK DETERMINATION

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### 5.1 Unreasonable Risk

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#### 5.1.1 Overview

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In each risk evaluation under TSCA section 6(b), EPA determines whether a chemical substance presents an unreasonable risk of injury to health or the environment, under the conditions of use. These determinations do not consider costs or other non-risk factors. In making these determinations, EPA considers relevant risk-related factors, including, but not limited to: the effects of the chemical substance on health and human exposure to such substance under the conditions of use (including cancer and non-cancer risks); the effects of the chemical substance on the environment and environmental exposure under the conditions of use; the population exposed (including any potentially exposed or susceptible subpopulations (PESS)); the severity of hazard (including the nature of the hazard, the irreversibility of the hazard); and uncertainties. EPA also takes into consideration the Agency's confidence in the data used in the risk estimate. This includes an evaluation of the strengths, limitations and uncertainties associated with the information used to inform the risk estimate and the risk characterization. This approach is in keeping with the Agency's final rule, *Procedures for Chemical Risk Evaluation Under the Amended Toxic Substances Control Act* (82 FR 33726, ([U.S. EPA 2017h](#))).<sup>19</sup>

Under TSCA, conditions of use are defined as the circumstances, as determined by the Administrator, under which the substance is intended, known, or reasonably foreseen to be manufactured, processed, distributed in commerce, used, or disposed of. TSCA §3(4).

An unreasonable risk of injury to health may be indicated when health risks under the conditions of use are identified by comparing the estimated risks with the risk benchmarks and where the risks affect the general population or PESS, identified as relevant. For workers (which are one example of PESS), an unreasonable risk may be indicated when risks are not adequately addressed through expected use of workplace practices and exposure controls, including engineering controls or use of personal protective equipment (PPE). An unreasonable risk of injury to the environment may be indicated when environmental risks under the conditions of use are greater than environmental risk benchmarks. The risk estimates contribute to the evidence EPA uses to determine unreasonable risk.

EPA uses the term "indicates unreasonable risk" to indicate EPA concern for potential unreasonable risk. For non-cancer endpoints, "less than the MOE benchmark" is used to indicate potential unreasonable risk; this occurs if an MOE value is less than the benchmark MOE (e.g., MOE 0.3 < benchmark MOE 30). For cancer endpoints, EPA uses the term "greater than risk benchmark" to indicate potential unreasonable risk; this occurs, for example, if the lifetime cancer risk value is greater than 1 in 10,000 (e.g., cancer risk value is  $5 \times 10^{-2}$  which is greater than the standard range of acceptable cancer risk benchmarks of  $1 \times 10^{-4}$  to  $1 \times 10^{-6}$ ). For environmental endpoints, to indicate potential unreasonable risk EPA uses a risk quotient (RQ) value "greater than 1" (i.e.,  $RQ > 1$ ). Conversely, EPA uses the term "does not indicate unreasonable risk" to indicate that it is unlikely that EPA has a concern for potential unreasonable risk. More details are described below.

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<sup>19</sup> This risk determination is being issued under TSCA section 6(b) and the terms used, such as unreasonable risk, and the considerations discussed are specific to TSCA. Other statutes have different authorities and mandates and may involve risk considerations other than those discussed here.

10171 The degree of uncertainty surrounding the MOEs, cancer risk or RQs is a factor in determining whether  
10172 or not unreasonable risk is present. Where uncertainty is low, and EPA has high confidence in the  
10173 hazard and exposure characterizations (for example, the basis for the characterizations is measured or  
10174 monitoring data or a robust model and the hazards identified for risk estimation are relevant for  
10175 conditions of use), the Agency has a higher degree of confidence in its risk determination. EPA may also  
10176 consider other risk factors, such as severity of endpoint, reversibility of effect, or exposure-related  
10177 considerations, such as magnitude or number of exposures, in determining that the risks are  
10178 unreasonable under the conditions of use. Where EPA has made assumptions in the scientific evaluation,  
10179 whether or not those assumptions are protective will also be a consideration. Additionally, EPA  
10180 considers the central tendency and high-end scenarios when determining the unreasonable risk. High-  
10181 end risk estimates (i.e., 95th percentile) are generally intended to cover individuals or sub-populations  
10182 with greater exposure (PESS) and central tendency risk estimates are generally estimates of average or  
10183 typical exposure.

10184  
10185 EPA may make a no unreasonable risk determination for conditions of use where the substance's hazard  
10186 and exposure potential, or where the risk-related factors described previously, lead EPA to determine  
10187 that the risks are not unreasonable.

## 10188 **5.1.2 Risks to Human Health**

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### 10189 **5.1.2.1 Determining Non-Cancer Risks**

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10190 Margins of exposure (MOEs) are used in EPA's risk evaluations as a starting point to estimate non-  
10191 cancer risks for acute and chronic exposures. The non-cancer evaluation refers to potential adverse  
10192 health effects associated with health endpoints other than cancer, including to the body's organ systems,  
10193 such as reproductive/developmental effects, cardiac and lung effects, and kidney and liver effects. The  
10194 MOE is the point of departure (POD) (an approximation of the no-observed adverse effect level  
10195 (NOAEL) or benchmark dose level (BMDL)) for a specific health endpoint divided by the exposure  
10196 concentration for the specific scenario of concern. The benchmark for the MOE that is used accounts for  
10197 the total uncertainty in a POD, including, as appropriate: (1) the variation in sensitivity among the  
10198 members of the human population (i.e., intrahuman/intraspecies variability); (2) the uncertainty in  
10199 extrapolating animal data to humans (i.e., interspecies variability); (3) the uncertainty in extrapolating  
10200 from data obtained in a study with less-than-lifetime exposure to lifetime exposure (i.e., extrapolating  
10201 from subchronic to chronic exposure); and (4) the uncertainty in extrapolating from a lowest observed  
10202 adverse effect level (LOAEL) rather than from a NOAEL. MOEs can provide a non-cancer risk profile  
10203 by presenting a range of estimates for different non-cancer health effects for different exposure scenarios  
10204 and are a widely recognized point estimate method for evaluating a range of potential non-cancer health  
10205 risks from exposure to a chemical.

10206  
10207 A calculated MOE that is less than the benchmark MOE indicates the possibility of non-cancer risk to  
10208 human health. Whether those risks are unreasonable will depend upon other risk-related factors, such as  
10209 severity of endpoint, reversibility of effect, exposure-related considerations (e.g., duration, magnitude,  
10210 frequency of exposure, population exposed), and the confidence in the information used to inform the  
10211 hazard and exposure values. If the calculated MOE is greater than the benchmark MOE, generally it is  
10212 less likely that there is non-cancer risk.

10213  
10214 Uncertainty factors (UFs) also play an important role in the risk estimation approach and in determining  
10215 unreasonable risk. A lower benchmark MOE (e.g., 30) indicates greater certainty in the data (because  
10216 fewer of the default UFs relevant to a given POD as described above were applied). A higher benchmark



MOE (e.g., 1000) would indicate more uncertainty in risk estimation and extrapolation for the MOE for specific endpoints and scenarios. However, these are often not the only uncertainties in a risk evaluation.

### 5.1.2.2 Determining Cancer Risks

EPA estimates cancer risks by determining the incremental increase in probability of an individual in an exposed population developing cancer over a lifetime (excess lifetime cancer risk (ELCR)) following exposure to the chemical under specified use scenarios. Standard cancer benchmarks used by EPA and other regulatory agencies are an increased cancer risk above benchmarks ranging from 1 in 1,000,000 to 1 in 10,000 (i.e.,  $1 \times 10^{-6}$  to  $1 \times 10^{-4}$ ) depending on the subpopulation exposed. Generally, EPA considers  $1 \times 10^{-6}$  to  $1 \times 10^{-4}$  as the appropriate benchmark for the general population, consumer users, and non-occupational PESS.<sup>20</sup>

For the subject chemical substance, the EPA, consistent with 2017 NIOSH guidance,<sup>21</sup> used  $1 \times 10^{-4}$  as the benchmark for the purposes of this risk determination for individuals in industrial and commercial work environments subject to Occupational Safety and Health Act (OSHA) requirements. It is important to note that  $1 \times 10^{-4}$  is not a bright line and EPA has discretion to make risk determinations based on other benchmarks as appropriate. It is important to note that exposure-related considerations (duration, magnitude, population exposed) can affect EPA's estimates of the excess lifetime cancer risk.

### 5.1.3 Determining Environmental Risk

To assess environmental risk, EPA identifies and evaluates environmental hazard data for aquatic, sediment-dwelling, and terrestrial organisms exposed under acute and chronic exposure conditions. The environmental risk includes any risks that exceed benchmarks to the aquatic environment from levels of the evaluated chemical released to the environment (e.g., surface water, sediment, soil, biota) under the conditions of use, based on the fate properties, release potential, and reasonably available environmental monitoring and hazard data.

Environmental risks are estimated by calculating a RQ. The RQ is defined as:

$$\text{RQ} = \text{Environmental Concentration} / \text{Effect Level}$$

An RQ equal to 1 indicates that the exposures are the same as the concentration that causes effects. If the RQ is greater than 1, the exposure is greater than the effect concentration and there is potential for risk. If the RQ is less than 1, the exposure is less than the effect concentration and unreasonable risk is not likely. The Concentrations of Concern (COC) or hazard value for certain aquatic organisms are used to calculate RQs for acute and chronic exposures. For environmental risk, EPA is more likely to determine that there is unreasonable risk if the RQ exceeds 1 for the conditions of use being evaluated. Consistent with EPA's human health evaluations, the RQ is not treated as a bright line and other risk-based factors

<sup>20</sup> As an example, when EPA's Office of Water in 2017 updated the Human Health Benchmarks for Pesticides, the benchmark for a "theoretical upper-bound excess lifetime cancer risk" from pesticides in drinking water was identified as 1 in 1,000,000 to 1 in 10,000 over a lifetime of (U.S. EPA 2017d). Similarly, EPA's approach under the Clean Air Act to evaluate residual risk and to develop standards is a two-step approach that includes a "presumptive limit on maximum individual lifetime [cancer] risk (MIR) of approximately 1 in 10 thousand" and consideration of whether emissions standards provide an ample margin of safety to protect public health "in consideration of all health information, including the number of persons at risk levels higher than approximately 1 in 1 million, as well as other relevant factors" (54 FR 38044, 38045, (Federal Register 1989)).

<sup>21</sup> NIOSH Current intelligence bulletin 68: NIOSH chemical carcinogen policy (Whittaker et al. 2016).

10253 may be considered (e.g., exposure scenario, uncertainty, severity of effect) for purposes of making a risk  
10254 determination.

## 10255 **5.2 Risk Determinations for PCE**

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10256 EPA's draft determinations of unreasonable risk for specific conditions of use of PCE listed below are  
10257 based on environmental risks to aquatic organisms, health risks to workers and occupational non-users  
10258 (ONUs) during occupational exposures, and health risks to consumers and bystanders during exposures  
10259 to consumer uses.

10260  
10261 For risks to the environment, as described in Section 4, EPA identified environmental risks to aquatic  
10262 organisms (aquatic invertebrates, fish, and aquatic plants). In Table 5-1 and Section 5.3 below, the driver  
10263 endpoints for EPA's preliminary determination of unreasonable risks to aquatic organisms are  
10264 immobilization from acute exposure, growth effects from chronic exposure, and mortality to algae.

10265 For risks to health, as described in Section 4, significant risks associated with more than one adverse  
10266 effect (e.g. central nervous system, kidney, liver, immune system and developmental toxicity) were  
10267 identified for particular conditions of use. The evaluation of cancer included estimates of risk of lung  
10268 and liver tumors. In Table 5-1 and Section 5.3 below, EPA identifies neurotoxicity as the driver  
10269 endpoint for the conditions of use that EPA has preliminarily determined present unreasonable risks.  
10270 This is the effect that is most sensitive, and it is expected that addressing risks for this effect would  
10271 address other identified risks.

- 10272 • Workers: EPA evaluated workers' acute and chronic inhalation and dermal exposures for cancer  
10273 and non-cancer risks and determined whether any risks are unreasonable. The drivers for EPA's  
10274 determination of unreasonable risk for workers are neurotoxicity from acute and chronic  
10275 inhalation and dermal exposures and cancer from chronic inhalation and dermal exposures. The  
10276 determinations reflect the effects associated with the occupational exposures to PCE and  
10277 incorporate consideration of assumed PPE. EPA expects there is compliance with federal and  
10278 state laws, such as worker protection standards, unless case-specific facts indicate otherwise, and  
10279 therefore existing OSHA regulations for worker protection and hazard communication will result  
10280 in use of appropriate PPE consistent with the applicable SDSs. Estimated numbers of workers  
10281 are in Section 2.4.1.2. EPA estimated dermal exposures using the Dermal Exposure to Volatile  
10282 Liquids Model because dermal exposure data were not reasonably available for the conditions of  
10283 use.
- 10284 • Occupational Non-Users (ONUs): EPA considers occupational non-users to be a subset of  
10285 workers for whom the potential inhalation exposures may differ based on proximity to the  
10286 exposure source. ONU inhalation exposures are expected to be lower than inhalation exposures  
10287 for workers directly handling the chemical substance. EPA evaluated ONU acute and chronic  
10288 inhalation exposures for cancer and non-cancer risks and determined whether any risks are  
10289 unreasonable. The drivers for EPA's determination of unreasonable risks to ONUs are  
10290 neurotoxicity from acute and chronic inhalation exposures and cancer from chronic inhalation  
10291 exposures. The determinations reflect the effects associated with the occupational exposures to  
10292 PCE and the assumed absence of PPE for ONUs. For dermal exposures, because ONUs are not  
10293 expected to be dermally exposed to PCE, dermal risks to ONUs were not evaluated. For  
10294 inhalation exposures, EPA, where possible, used monitoring or modeling information to estimate  
10295 ONU exposures and to describe the risks separately from workers directly exposed. For some  
10296

10297 conditions of use, EPA did not separately calculate risk estimates for ONUs and workers. For  
10298 these conditions of use, there is uncertainty in the ONU risk estimates since the data or modeling  
10299 did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation  
10300 exposures are expected to be lower than inhalation exposures for workers directly handling the  
10301 chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be  
10302 quantified. To account for this uncertainty, EPA considered the central tendency risk estimate for  
10303 workers when determining ONU risk for those conditions of use for which ONU exposures were  
10304 not separately estimated. Estimated numbers of occupational non-users are in Section 2.4.1.2.  
10305

- 10306 • Consumers: EPA evaluated consumer acute inhalation and dermal exposures for non-cancer risks  
10307 and determined whether any risks are unreasonable. The driver for EPA's determination of  
10308 unreasonable risk is neurotoxicity from acute inhalation and dermal exposures. Generally, risks  
10309 for consumers were indicated by acute inhalation and dermal exposure at low, medium, and high  
10310 intensity use. For nearly half of the consumer uses, dermal exposure was not evaluated because  
10311 PCE is a volatile solvent and is expected to quickly evaporate from skin. However, for certain  
10312 consumer use scenarios product evaporation may be limited (e.g., handling/wiping using a  
10313 solvent soaked rag). For these conditions of use, consumer dermal exposure was evaluated.  
10314 Estimated numbers of consumers are in Section 2.4.2.2.  
10315
- 10316 • Bystanders (from consumer uses): EPA evaluated bystander acute inhalation exposures for non-  
10317 cancer risks and determined whether any risks are unreasonable. The driver for EPA's  
10318 determination of unreasonable risk are neurotoxicity from acute inhalation exposure. Generally,  
10319 risks for bystanders were indicated by acute inhalation exposure scenarios at low, medium, and  
10320 high intensity use. Because bystanders are not expected to be dermally exposed to PCE, dermal  
10321 non-cancer risks to bystanders were not evaluated. Estimated numbers of bystanders are in  
10322 Section 2.4.2.2.  
10323
- 10324 • Environmental risks: EPA determined that environmental exposures are expected for aquatic  
10325 organisms for the conditions of use within the scope of the risk evaluation. EPA's evaluation  
10326 assessed risks to aquatic organisms because PCE has low bioconcentration potential and  
10327 moderate potential to accumulate in wastewater biosolids, soil, or sediment. The drivers for  
10328 EPA's draft determination of unreasonable risks to aquatic organisms are immobilization from  
10329 acute exposure, growth effects from chronic exposure, and mortality to algae. Algae was  
10330 assessed separately and not incorporated into acute or chronic COCs, because durations normally  
10331 considered acute for other species (e.g. 48, 72 hours) can encompass several generations of  
10332 algae. Confidence in acute and chronic COCs for fish and invertebrates are high. The confidence  
10333 in algae COC is medium given that the COC for algae is based on a single study and that data  
10334 were only available for three algal species that may not represent the most sensitive species at a  
10335 given site. Algae species tend to vary widely in their sensitivity to chemical pollutants and the  
10336 sites assessed included both free-flowing water bodies (i.e., rivers and streams) and still water  
10337 bodies (i.e., bays, lakes, and estuaries). Because current regulations do not require facilities to  
10338 report the number of days associated with reported releases, EPA estimated site-specific surface  
10339 water concentrations for discharges using upper and lower bounds for the range of predicted  
10340 surface water concentrations. Details of EPA's estimates are in Section 4.1.2 and include  
10341 consideration of the number of facility operating days per year, partial removal of PCE from  
10342 industrial wastes or wastewater following treatment, and the impacts of any direct releases of  
10343 wastes to surface waters without treatment. Site-specific surface water concentration estimates

for free-flowing water bodies were reported for both the 7Q10 (the lowest consecutive 7-day average flow during any 10-year period) and harmonic mean stream flows. Based on the estimated surface water PCE concentration and COC confidence levels, the overall confidence in the risk estimate to aquatic organisms from exposure to PCE is medium. In general, the majority of releases of PCE to the aquatic environment do not exceed the aquatic benchmark. However, there are specific facilities for given COUs where estimated or reported releases result in modeled surface water concentrations that exceed the aquatic benchmark (see Section 4.1.2). While nine COUs had RQs  $\geq 1$ , indicating risk, no risks were identified for aquatic organisms for all other COUs. EPA’s preliminary determination regarding unreasonable risks for each of the nine COUs indicating risks is discussed further under the specific COU in Section 5.3.

As described below, risks to the general population were not evaluated.

- General population:** Exposure pathways to the general population are covered by other statutes and consist of: the ambient air pathway (i.e., PCE is listed as a hazardous air pollutant (HAP) in the Clean Air Act (CAA)), the drinking water pathway (i.e., National Primary Drinking Water Regulations (NPDWRs) are promulgated for PCE under the Safe Drinking Water Act), ambient water pathways (i.e., PCE is a priority pollutant with recommended water quality criteria for protection of human health under the CWA), biosolids pathways (i.e., PCE has been identified in biosolids biennial reviews under the CWA), disposal pathways (PCE disposal is managed and prevented from further environmental release by RCRA and SDWA regulations). As described above, other environmental statutes administered by EPA adequately assess and effectively manage these exposures. EPA believes that the TSCA risk evaluation should focus on those exposure pathways associated with TSCA conditions of use that are not subject to the regulatory regimes discussed above because those pathways are likely to represent the greatest areas of concern to EPA. Therefore, EPA did not evaluate hazards or exposures to the general population in this risk evaluation, and there is no risk determination for the general population.

Table 5-1 below presents an overview of risk determinations by condition of use. An in-depth explanation of each determination follows the table, in Section 5.3. For the conditions of use where EPA found no unreasonable risk, EPA describes the estimated risks in Section 4.4 (or Section 2.4.3).

**Table 5-1. Summary of Unreasonable Risk Determinations by Condition of Use**

Condition of Use	Unreasonable Risk Determination
Manufacture – Domestic Manufacture	<p><b>Presents an unreasonable risk of injury to health (workers).</b></p> <p>Does not present an unreasonable risk of injury to health (occupational non-users).</p> <p>Does not present an unreasonable risk of injury to the environment (aquatic organisms).</p>
Manufacture – Import (includes repackaging and loading/unloading)	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users (ONUs)).</b></p> <p>Does not present an unreasonable risk of injury to the environment (aquatic organisms).</p>

Condition of Use	Unreasonable Risk Determination
Processing – Processing as a reactant/intermediate in industrial gas manufacturing; intermediate in basic organic chemical manufacturing; intermediate in petroleum refineries; residual or byproduct reused as a reactant	<p><b>Presents an unreasonable risk of injury to health (workers).</b></p> <p><b>Presents an unreasonable risk to the environment (aquatic organisms).</b></p> <p>Does not present an unreasonable risk of injury to health (occupational non-users).</p>
Processing – Incorporation into formulation, mixture or reaction product – Cleaning and degreasing products	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b></p> <p>Does not present unreasonable risk to the environment (aquatic organisms).</p>
Processing – Incorporation into formulation, mixture or reaction product – Adhesive and sealant products	<p><b>Presents an unreasonable risk of injury to health (workers).</b></p> <p>Does not present an unreasonable risk of injury to health (occupational non-users).</p> <p>Does not present unreasonable risk to the environment (aquatic organisms).</p>
Processing – Incorporation into formulation, mixture or reaction product – Paint and coating products	<p><b>Presents an unreasonable risk of injury to health (workers).</b></p> <p>Does not present an unreasonable risk of injury to health (occupational non-users).</p> <p>Does not present unreasonable risk to the environment (aquatic organisms).</p>
Processing – Incorporation into formulation, mixture or reaction product – Other chemical products and preparations	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b></p> <p>Does not present unreasonable risk to the environment (aquatic organisms).</p>
Processing – Repackaging – Solvents (for cleaning or degreasing); intermediate	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users (ONUs)).</b></p> <p>Does not present an unreasonable risk of injury to the environment (aquatic organisms).</p>
Processing – Recycling	<p><b>Presents an unreasonable risk of injury to health (workers).</b></p> <p><b>Presents an unreasonable risk to the environment (aquatic organisms).</b></p> <p>Does not present an unreasonable risk of injury to health (occupational non-users).</p>

Condition of Use	Unreasonable Risk Determination
Distribution in Commerce	Does not present an unreasonable risk of injury to health (workers and occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).
Industrial use – Solvents (for cleaning or degreasing) – Batch vapor degreaser (open-top)	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).
Industrial use – Solvents (for cleaning or degreasing) – Batch vapor degreaser (closed-loop)	<b>Presents an unreasonable risk of injury to health (workers).</b> Does not present an unreasonable risk of injury to health (occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).
Industrial use – Solvents (for cleaning or degreasing) – In-line vapor degreaser (conveyorized)	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).
Industrial use – Solvents (for cleaning or degreasing) – In-line vapor degreaser (web cleaner)	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).
Industrial use – Solvents (for cleaning or degreasing) – Cold cleaner	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).
Industrial use – Solvents (for cleaning or degreasing) – Aerosol spray degreaser/cleaner	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).
Industrial Use – Cleaning and furniture care products – Dry Cleaning and Spot Cleaning Post-2006 Dry Cleaning	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).

Condition of Use	Unreasonable Risk Determination
Industrial Use – Cleaning and furniture care products – Dry Cleaning and Spot Cleaning 4 <sup>th</sup> /5 <sup>th</sup> Gen Only Dry Cleaning	<p><b>Presents an unreasonable risk of injury to health (workers).</b>                      Does not present an unreasonable risk of injury to health (occupational non-users).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Lubricants and greases – Lubricants and greases (aerosol lubricants)	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b>                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Lubricants and greases – Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants)	<p>Does not present an unreasonable risk of injury to health (workers and occupational non-users).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Adhesives and sealants – Solvent-based adhesives and sealants	<p><b>Presents an unreasonable risk of injury to health (workers).</b>                      Does not present an unreasonable risk of injury to health (occupational non-users).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Paints and coatings – Solvent-based paints and coatings	<p><b>Presents an unreasonable risk of injury to health (workers).</b>                      Does not present an unreasonable risk of injury to health (occupational non-users).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Paints and coatings – Maskant for Chemical Milling	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b>                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Processing aids, not otherwise listed – Pesticide, fertilizer and other agricultural chemical manufacturing	<p><b>Presents an unreasonable risk of injury to health (workers).</b>                      Does not present an unreasonable risk of injury to health (occupational non-users).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>

Condition of Use	Unreasonable Risk Determination
Industrial use – Processing aids, specific to petroleum production – Catalyst regeneration in petrochemical manufacturing	<p><b>Presents an unreasonable risk of injury to health (workers).</b>  <b>Presents an unreasonable risk to the environment (aquatic organisms).</b>                      Does not present an unreasonable risk of injury to health (occupational non-users).</p>
Industrial use – Other uses – Textile processing (spot cleaning)	<p><b>Presents an unreasonable risk of injury to health (workers).</b>                      Does not present an unreasonable risk of injury to health (occupational non-users).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Other uses – Textile processing (other)	<p><b>Presents an unreasonable risk of injury to health (workers).</b>                      Does not present an unreasonable risk of injury to health (occupational non-users).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Other uses – Wood furniture manufacturing	<p><b>Presents an unreasonable risk of injury to health (workers).</b>                      Does not present an unreasonable risk of injury to health (occupational non-users).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Other uses – Laboratory chemicals	<p>Does not present an unreasonable risk of injury to health (workers and ONUs).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Industrial use – Other uses – Foundry applications	<p><b>Presents an unreasonable risk of injury to health (workers).</b>                      Does not present an unreasonable risk of injury to health (occupational non-users).                      Does not present unreasonable risk to the environment (aquatic organisms).</p>
Commercial Use – Cleaning and furniture care products – Cleaners and degreasers (other) (wipe cleaning)	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b>                      Does not present unreasonable risk to the environment (aquatic organisms).</p>



Condition of Use	Unreasonable Risk Determination
Commercial Use – Cleaning and furniture care products – Cleaners and degreasers (other) (Other Spot Cleaning/Spot Removers (Including Carpet Cleaning))	<p><b>Presents an unreasonable risk of injury to health (workers).</b> Does not present an unreasonable risk of injury to health (occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).</p>
Commercial Use – Cleaning and furniture care products – Cleaners and degreasers (other) (Mold Release)	<p><b>Presents an unreasonable risk of injury to health (workers).</b> Does not present an unreasonable risk of injury to health (occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).</p>
Commercial Use – Cleaning and furniture care products – Dry Cleaning and Spot Cleaning Post-2006 Dry Cleaning	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).</p>
Commercial Use – Cleaning and furniture care products – Dry Cleaning and Spot Cleaning 4 <sup>th</sup> /5 <sup>th</sup> Gen Only Dry Cleaning	<p><b>Presents an unreasonable risk of injury to health (workers).</b> Does not present an unreasonable risk of injury to health (occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).</p>
Commercial Use – Cleaning and furniture care products – Automotive care products (e.g., engine degreaser and brake cleaner)	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).</p>
Commercial Use – Cleaning and furniture care products – Aerosol cleaner	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).</p>
Commercial Use – Cleaning and furniture care products – Non-aerosol cleaner	<p><b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).</p>

Condition of Use	Unreasonable Risk Determination
Commercial Use – Lubricants and greases – Lubricants and greases (aerosol lubricants)	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).
Commercial Use – Lubricants and greases – Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)	Does not present an unreasonable risk of injury to health (workers and occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).
Commercial Use – Adhesives and sealant chemicals – Light repair adhesives	<b>Presents an unreasonable risk of injury to health (workers).</b> Does not present an unreasonable risk of injury to health (occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).
Commercial Use – Paints and coatings – Solvent-based paints and coatings	<b>Presents an unreasonable risk of injury to health (workers).</b> Does not present an unreasonable risk of injury to health (occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).
Commercial use – Other uses – Carpet cleaning	<b>Presents an unreasonable risk of injury to health (workers).</b> Does not present an unreasonable risk of injury to health (occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).
Commercial use – Other uses – Laboratory chemicals	Does not present an unreasonable risk of injury to health (workers and occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).
Commercial use – Other uses – Metal (e.g., stainless steel) and stone polishes	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).
Commercial use – Other uses – Inks and ink removal products (based on printing)	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).

Condition of Use	Unreasonable Risk Determination
Commercial use – Other uses – Inks and ink removal products (based on photocopying)	<b>Presents an unreasonable risk of injury to health (workers).</b> Does not present an unreasonable risk of injury to health (occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).
Commercial use – Other uses – Welding	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).
Commercial use – Other uses – Photographic film	<b>Presents an unreasonable risk of injury to health (workers and occupational non-users).</b> Does not present unreasonable risk to the environment (aquatic organisms).
Commercial use – Other uses – Mold cleaning, release and protectant products	<b>Presents an unreasonable risk of injury to health (workers).</b> Does not present an unreasonable risk of injury to health (occupational non-users). Does not present unreasonable risk to the environment (aquatic organisms).
Consumer Use – Cleaning and furniture care products – Cleaners and degreasers (other)	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>
Consumer Use – Cleaning and furniture care products – Dry cleaning solvent	<b>Presents an unreasonable risk of injury to health (consumers).</b> Does not present an unreasonable risk of injury to health (bystanders).
Consumer Use – Cleaning and furniture care products – Automotive care products (Brake cleaner)	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>
Consumer Use – Cleaning and furniture care products – Automotive care products (Parts cleaner)	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>
Consumer Use – Cleaning and furniture care products – Aerosol cleaner (Vandalism Mark & Stain Remover, Mold Cleaner, Weld Splatter Protectant)	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>
Consumer Use – Cleaning and furniture care products – Non-aerosol cleaner (e.g., marble and stone polish)	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>
Consumer Use – Lubricants and greases – Lubricants and greases (Cutting Fluid)	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>

Condition of Use	Unreasonable Risk Determination
Consumer Use – Lubricants and greases – Lubricants and greases (Lubricants and Penetrating Oils)	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>
Consumer Use – Adhesives and sealant chemicals – Adhesives for arts and crafts (includes industrial adhesive, arts and crafts adhesive, gun ammunition sealant)	<b>Presents an unreasonable risk of injury to health (consumers).</b> Does not present an unreasonable risk of injury to health (bystanders).
Consumer Use – Adhesives and sealant chemicals – Adhesives for arts and crafts (Livestock Grooming Adhesive)	Does not present an unreasonable risk of injury to health (consumers and bystanders).
Consumer Use – Adhesives and sealant chemicals – Adhesives for arts and crafts (Column Adhesive, Caulk and Sealant)	<b>Presents an unreasonable risk of injury to health (consumers).</b> Does not present an unreasonable risk of injury to health (bystanders).
Consumer Use – Paints and coatings – Solvent-based paints and coatings (Outdoor water shield (liquid))	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>
Consumer Use – Paints and coatings – Solvent-based paints and coatings (Coatings and primers (aerosol))	Does not present an unreasonable risk of injury to health (consumers and bystanders).
Consumer Use – Paints and coatings – Solvent-based paints and coatings (Rust Primer and Sealant (liquid))	<b>Presents an unreasonable risk of injury to health (consumers).</b> Does not present an unreasonable risk of injury to health (bystanders).
Consumer Use – Paints and coatings – Solvent-based paints and coatings (Metallic Overglaze)	Does not present an unreasonable risk of injury to health (consumers and bystanders).
Consumer Use – Other Uses – Metal (e.g., stainless steel) and stone polishes	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>
Consumer Use – Other Uses – Inks and ink removal products; welding; mold cleaning, release and protectant products	<b>Presents an unreasonable risk of injury to health (consumers and bystanders).</b>
Disposal	<b>Presents an unreasonable risk of injury to health (workers).</b> <b>Presents an unreasonable risk to the environment (aquatic organisms).</b> Does not present an unreasonable risk of injury to health (occupational non-users).

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### 5.3 Detailed Risk Determinations by Condition of Use

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#### 5.3.1 Manufacture – Domestic manufacture

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##### Section 6(b)(4)(A) unreasonable risk determination of domestic manufacture of PCE:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present an unreasonable risk of injury to the environment (aquatic organisms).

##### Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

##### Driver benchmarks – workers:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

##### Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF = 20). (Table 4-69)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), the dermal chronic non-cancer risk estimate (high-end) indicates risk even with assumed dermal protection (PF 20). Risk estimates for ONUs for acute and chronic inhalation do not indicate risk at the central tendency. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. EPA assessed inhalation exposures during manufacturing using monitoring data submitted by the Halogenated Solvents Industry Alliance (HSIA).

While EPA identified environmental risk for this COU, given the uncertainties in the data, EPA does not consider these risks unreasonable. Of the six facilities assessed as manufacturing PCE, there were two facilities with releases indicating risk to aquatic organisms ( $RQ \geq 1$  and 20 days or more of exceedance for algae). RQ values ranged from 2.64 (100 days of exceedance, indirect discharge) to 13.2 (189 days of exceedance, direct discharge). Industrial wastewater or liquid wastes may be treated on-site and then released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80% removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water. Exceedances occurred using direct and indirect release scenarios but were highest for direct release scenarios. Four of the six facilities assessed as manufacturing PCE did not have NPDES permits. EPA identified risk to algae from direct and indirect release of PCE to surface water from two of the facilities without NPDES permits. Lack of a NPDES permit increases the uncertainty in the surface water release estimate for a facility. Based on the surface water PCE concentration and COC

confidence levels, the overall confidence in the risk estimate to aquatic organisms from exposure to PCE is medium.

Life Cycle Stage	Category	Subcategory
Manufacture	Domestic manufacture	Domestic manufacture

### 5.3.2 Manufacture – Import (includes repackaging and loading/unloading)

Section 6(b)(4)(A) unreasonable risk determination for manufacture – import of PCE (includes repackaging and loading/unloading):

- **Presents an unreasonable risk of injury to health (workers and occupational non-users (ONUs)).**
- Does not present an unreasonable risk of injury to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF = 20). (Table 4-69)

Risk estimate – ONUs:

- Neurotoxicity:
  - Chronic inhalation MOE 52 (central tendency). (Table 4-8)

**Risk Considerations:** For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), the dermal chronic non-cancer risk estimate (high-end) indicates risk even with assumed dermal protection (PF 20). Risk estimates for ONUs for chronic inhalation exposures indicated non-cancer risk at the central tendency, while acute inhalation exposures did not indicate risk. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk.

While EPA identified environmental risks for this COU, given the uncertainties in the data, EPA does not consider these risks unreasonable. Of the four facilities assessed as importing or repackaging PCE, a single facility had releases indicating risk to aquatic organisms ( $RQ \geq 1$  and 20 days or more of exceedance for algae). RQ values were 20.62 (230 days of exceedance, indirect release) and 256.8 (20 days of exceedance, indirect release). Industrial wastewater or liquid wastes may be treated on-site and then released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80% removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water. The exceedance occurred for indirect release. An exceedance from indirect release indicates that risk can exist even with waste water treatment if the rate of PCE release to surface water is high. One of the facilities assessed as manufacturing PCE did not have NPDES permits. EPA only identified risk to algae from the one facility lacking a NPDES permit. Lack of a NPDES permit increases the uncertainty in the surface water release estimate for a facility. Based on the surface water PCE concentration and COC confidence levels, the overall confidence in the risk estimate to aquatic organisms from exposure to PCE is medium.

Life Cycle Stage	Category	Subcategory
Manufacture	Import	Import

### 5.3.3 Processing – Processing as a reactant/intermediate in industrial gas manufacturing; intermediate in basic organic chemical manufacturing; intermediate in petroleum refineries; residual or byproduct reused as a reactant

Section 6(b)(4)(A) unreasonable risk determination for processing of PCE as a reactant/intermediate in industrial gas manufacturing; intermediate in basic organic chemical manufacturing; intermediate in petroleum refineries; and as a residual or byproduct and reused as a reactant:

- **Presents an unreasonable risk of injury to health (workers).**
- **Presents an unreasonable risk to the environment (aquatic organisms).**
- Does not present an unreasonable risk of injury to health (occupational non-users).

Unreasonable risk driver – workers and aquatic organisms:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.
- Growth effects to aquatic invertebrates from chronic exposure.
- Algae mortality from exposure.

Driver benchmarks – workers and aquatic organisms:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .
- Growth effects: Chronic (aquatic invertebrates)  $RQ \geq 1$ .
- Mortality: Algae  $RQ \geq 1$ .

Risk estimate - workers:

- Neurotoxicity:

- Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF = 20). (Table 4-69)

Risk estimate for facilities with exceedances – aquatic organisms: (Table 4-110)

- Growth effects to aquatic invertebrates from chronic exposure:
  - RQ = 1.0 (chronic, aquatic invertebrates, 20 days of exceedance, direct release).
  - RQ = 2.0 (chronic, aquatic invertebrates, 20 days of exceedance, direct release).
- Algae mortality from exposure: (some facilities had exceedances for multiple scenarios)
  - RQ = 1.7 (algae, 350 days of exceedance, direct release).
  - RQ = 25 (algae, 20 days of exceedance, direct release).
  - RQ = 1.1 (algae, 29 days of exceedance, direct release).
  - RQ = 2.2 (algae, 350 days of exceedance, direct release).
  - RQ = 37 (algae, 20 days of exceedance, direct release).
  - RQ = 3.5 (algae, 193 days of exceedance, direct release).
  - RQ = 61 (algae, 20 days of exceedance, direct release).
  - RQ = 3.6 (algae, 350 days of exceedance, direct release).
  - RQ = 71 (algae, 20 days of exceedance, direct release).
  - RQ = 1.4 (algae, 67 days of exceedance, direct release).

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), the dermal chronic non-cancer risk estimate (high-end) indicates risk even with assumed dermal protection (PF 20). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. Exposure is assessed using PCE personal breathing zone monitoring data collected at facilities manufacturing PCE as a surrogate for facilities processing PCE as reactant. The data were determined to have a “high” confidence rating through EPA’s systematic review process. Although these data are not directly applicable to processing of PCE as a reactant, EPA expects a high degree of overlap of worker tasks at both manufacturing sites and sites processing PCE as a reactant. EPA assessed PCE as a reactant where it was produced as a byproduct from manufacture of 1,2-dichloroethane (CASRN 107-06-2) and reused as a reactant.

Environmental releases for this condition of use indicate chronic risk to aquatic organisms and risk to algae. Of the 18 facilities processing PCE as a reactant, six facilities had releases indicating risk to aquatic organisms (RQs  $\geq 1$  and 20 days or more of exceedance for aquatic organisms) with the highest RQ being 71 (algae, 20 days of exceedance, direct release). For the six facilities indicating risk, EPA identified risk to algae from all six facilities and chronic risk to aquatic organisms from two facilities. Industrial wastewater or liquid wastes may be treated on-site and then released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80% removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water. All exceedances occurred using the direct release to surface water scenario. All of the facilities assessed as processing PCE as a reactant had NPDES permits. Based on the surface water PCE concentration and



10555 COC confidence levels, the overall confidence in the risk estimate to aquatic organisms from exposure  
 10556 to PCE is medium.  
 10557

Life Cycle Stage	Category	Subcategory
Processing	Processing as a reactant or intermediate	<ul style="list-style-type: none"> <li>• Intermediate in industrial gas manufacturing</li> <li>• Intermediate in basic organic chemical manufacturing</li> <li>• Intermediate in petroleum refineries</li> <li>• Residual or byproduct as a reactant</li> </ul>

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10559 **5.3.4 Processing – Incorporation into formulation, mixture or reaction product –**  
 10560 **Cleaning and degreasing products**

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10561

10562 Section 6(b)(4)(A) unreasonable risk determination for processing PCE for incorporation into a  
 10563 formulation, mixture, or reaction product – cleaning and degreasing products:

10564

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

10565

10566 Unreasonable risk driver – workers:

10567

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

10568

10569 Unreasonable risk driver – ONUs:

10570

- Neurotoxicity resulting from acute and chronic inhalation exposures.

10571

10572 Driver benchmarks – workers and ONUs:

10573

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

10574

10575 Risk estimate - workers:

10576

- Neurotoxicity:
  - Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF = 20). (Table 4-69)

10577

10578 Risk estimate – ONUs:

10579

- Neurotoxicity:
  - Acute inhalation MOEs 1.3 (central tendency). (Table 4-13) (dry cleaning solvent)
  - Chronic inhalation MOEs 60 (central tendency). (Table 4-14) (dry cleaning solvent)

10580

10581 Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures  
 10582 do not indicate risks with assumed respiratory protection (APF 25), the dermal chronic non-cancer risk  
 10583 estimate (high-end) indicates risk even with assumed dermal protection (PF 20). Risk estimates for  
 10584

10585

10591 ONUs for acute and chronic inhalation exposures (central tendency) indicate risk. Two exposure  
 10592 scenarios, degreasing solvent and dry cleaning solvent, apply to this condition of use. EPA made its  
 10593 draft determination based on the dry cleaning solvent scenario, which was more representative of the  
 10594 condition of use. EPA did not separately calculate risk estimates for ONUs and workers. There is  
 10595 uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU  
 10596 inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation  
 10597 exposures for workers directly handling the chemical substance; however, the relative exposure of  
 10598 ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered  
 10599 the central tendency estimate when determining ONU risk.

10600  
 10601 While EPA identified environmental risks for this COU, given the uncertainties in the data, EPA does  
 10602 not consider these risks unreasonable. Of the four facilities assessed as using PCE for incorporation into  
 10603 formulations, a single facility had releases indicating RQs  $\geq 1$  for acute, chronic, and algae risks. RQ  
 10604 values for algae were 96.84 (299 days of exceedance, indirect release) and 1,453.06 (20 days of  
 10605 exceedance, indirect release). RQ values for chronic effects to aquatic organisms were 2.71 (127 days of  
 10606 exceedance, indirect release) and 40.69 (20 days of exceedance, indirect release). The RQ value for the  
 10607 acute effect to aquatic organisms was 1.52 (acute, aquatic invertebrates, 20 days of exceedance, direct  
 10608 release). Industrial wastewater or liquid wastes may be treated on-site and then released to surface water  
 10609 (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80%  
 10610 removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water.  
 10611 The exceedance occurred for indirect release. The facility indicating risk had the highest surface water  
 10612 concentrations for all indirect releases evaluated (both maximum days of release and 20 days of release  
 10613 scenarios). The annual release at this facility was the highest of all active releasers, and generally was an  
 10614 order of magnitude higher than all other releases. The facility showing risk has a NPDES permit.

10615

Life Cycle Stage	Category	Subcategory
Processing	Incorporated into formulation, mixture or reaction product	Cleaning and degreasing products

10616  
 10617 **5.3.5 Processing – Incorporation into formulation, mixture or reaction product –**  
 10618 **Adhesive and sealant products**

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10619  
 10620 Section 6(b)(4)(A) unreasonable risk determination for processing PCE for incorporation into a  
 10621 formulation, mixture, or reaction product – adhesive and sealant products:

- 10622 • **Presents an unreasonable risk of injury to health (workers).**
- 10623 • Does not present an unreasonable risk of injury to health (occupational non-users).
- 10624 • Does not present unreasonable risk to the environment (aquatic organisms).

10625 Unreasonable risk driver – workers:

- 10626 • Neurotoxicity resulting from chronic dermal exposures.
- 10627 • Cancer resulting from chronic dermal exposures.

10628  
 10629 Driver benchmarks – workers:

- 10630 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.

- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF = 20). (Table 4-69)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), the dermal chronic non-cancer risk estimate (high-end) indicates risk even with assumed dermal protection (PF 20). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk.

While EPA identified environmental risks for this COU, given the uncertainties in the data, EPA does not consider these risks unreasonable. Of the four facilities assessed as using PCE for incorporation into formulations, a single facility had releases indicating RQs  $\geq 1$  for acute, chronic, and algae risks. RQ values for algae were 96.84 (299 days of exceedance, indirect release) and 1,453.06 (20 days of exceedance, indirect release). RQ values for chronic effects to aquatic organisms were 2.71 (127 days of exceedance, indirect release) and 40.69 (20 days of exceedance, indirect release). The RQ value for the acute effect to aquatic organisms was 1.52 (acute, aquatic invertebrates, 20 days of exceedance, direct release). Industrial wastewater or liquid wastes may be treated on-site and then released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80% removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water. The exceedance occurred for indirect release. The facility indicating risk had the highest surface water concentrations for all indirect releases evaluated (both maximum days of release and 20 days of release scenarios). The annual release at this facility was the highest of all active releasers, and generally was an order of magnitude higher than all other releases. The facility showing risk has a NPDES permit.

Life Cycle Stage	Category	Subcategory
Processing	Incorporated into formulation, mixture or reaction product	Adhesive and sealant products

**5.3.6 Processing – Incorporation into formulation, mixture or reaction product – Paint and coating products**

Section 6(b)(4)(A) unreasonable risk determination for processing PCE for incorporation into a formulation, mixture, or reaction product – adhesive and sealant products:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).

- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF = 20). (Table 4-69)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), the dermal chronic non-cancer risk estimate (high-end) indicates risk even with assumed dermal protection (PF 20). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk.

While EPA identified environmental risks for this COU, given the uncertainties in the data, EPA does not consider these risks unreasonable. Of the four facilities assessed as using PCE for incorporation into formulations, a single facility had releases indicating RQs  $\geq 1$  for acute, chronic, and algae risks. RQ values for algae were 96.84 (299 days of exceedance, indirect release) and 1,453.06 (20 days of exceedance, indirect release). RQ values for chronic effects to aquatic organisms were 2.71 (127 days of exceedance, indirect release) and 40.69 (20 days of exceedance, indirect release). The RQ value for the acute effect to aquatic organisms was 1.52 (acute, aquatic invertebrates, 20 days of exceedance, direct release). Industrial wastewater or liquid wastes may be treated on-site and then released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80% removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water. The exceedance occurred for indirect release. The facility indicating risk had the highest surface water concentrations for all indirect releases evaluated (both maximum days of release and 20 days of release scenarios). The annual release at this facility was the highest of all active releasers, and generally was an order of magnitude higher than all other releases. The facility showing risk has a NPDES permit.

Life Cycle Stage	Category	Subcategory
Processing	Incorporated into formulation, mixture or reaction product	Paint and coating products

10714 **5.3.7 Processing – Incorporation into formulation, mixture or reaction product – Other**  
10715 **chemical products and preparations**

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10716  
10717 Section 6(b)(4)(A) unreasonable risk determination for processing PCE for incorporation into a  
10718 formulation, mixture, or reaction product – other chemical products and preparations:

- 10719 • **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- 10720 • Does not present unreasonable risk to the environment (aquatic organisms).

10721 Unreasonable risk driver – workers:

- 10722 • Neurotoxicity resulting from chronic inhalation and dermal exposures.
- 10723 • Cancer resulting from chronic dermal exposures.

10724  
10725 Unreasonable risk driver – ONUs:

- 10726 • Neurotoxicity resulting from acute and chronic inhalation exposures.
- 10727 • Cancer resulting from chronic inhalation exposures.

10728  
10729 Driver benchmarks – workers and ONUs:

- 10730 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 10731 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 10732 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

10733  
10734 Risk estimate - workers:

- 10735 • Neurotoxicity:
  - 10736 ○ Chronic inhalation MOEs 69 and 43 (central tendency and high-end) with PPE (respirator
  - 10737 APF 25). (Table 4-14) (aerosol packing)
  - 10738 ○ Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF
  - 10739 = 20). (Table 4-69)

10740  
10741 Risk estimate – ONUs:

- 10742 • Neurotoxicity:
  - 10743 ○ Acute inhalation MOEs 0.6 (central tendency). (Table 4-13) (aerosol packing)
  - 10744 ○ Chronic inhalation MOEs 2.7 (central tendency). (Table 4-14) (aerosol packing)
- 10745 • Cancer (liver tumors):
  - 10746 ○ Inhalation:  $1.5 \times 10^{-3}$  (central tendency) without PPE. (Table 4-15) (aerosol packing)

10747  
10748 Risk Considerations: For workers, all pathways of occupational exposure for this condition of use  
10749 indicate risk, even with assumed respiratory protection (APF 25) and dermal protection (PF 20). Risk  
10750 estimates for ONUs for acute, chronic, and cancer inhalation exposures (central tendency) indicate risk.  
10751 EPA made its determination based on the aerosol packing scenario, which used personal breathing zone  
10752 monitoring data. While aerosol packing may not be representative of other formulation, EPA has a high  
10753 level of confidence in the assessed exposures based on the strength of the monitoring data. EPA did not  
10754 separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate  
10755 since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU  
10756 inhalation exposures are expected to be lower than inhalation exposures for workers directly handling  
10757 the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be  
10758 quantified. To account for this uncertainty, EPA considered the central tendency estimate when  
10759 determining ONU risk.

10760  
 10761 While EPA identified environmental risks for this COU, given the uncertainties in the data, EPA does  
 10762 not consider these risks unreasonable. Of the four facilities assessed as using PCE for incorporation into  
 10763 formulations, a single facility had releases indicating RQs  $\geq 1$  for acute, chronic, and algae risks. RQ  
 10764 values for algae were 96.84 (299 days of exceedance, indirect release) and 1,453.06 (20 days of  
 10765 exceedance, indirect release). RQ values for chronic effects to aquatic organisms were 2.71 (127 days of  
 10766 exceedance, indirect release) and 40.69 (20 days of exceedance, indirect release). The RQ value for the  
 10767 acute effect to aquatic organisms was 1.52 (acute, aquatic invertebrates, 20 days of exceedance, direct  
 10768 release). Industrial wastewater or liquid wastes may be treated on-site and then released to surface water  
 10769 (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80%  
 10770 removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water.  
 10771 The exceedance occurred for indirect release. The facility indicating risk had the highest surface water  
 10772 concentrations for all indirect releases evaluated (both maximum days of release and 20 days of release  
 10773 scenarios). The annual release at this facility was the highest of all active releasers, and generally was an  
 10774 order of magnitude higher than all other releases. The facility showing risk has a NPDES permit.  
 10775

Life Cycle Stage	Category	Subcategory
Processing	Incorporated into formulation, mixture or reaction product	Other chemical products and preparations

10776  
 10777  
 10778 **5.3.8 Processing – Repackaging – Solvents (for cleaning or degreasing); intermediate**

10779  
 10780 Section 6(b)(4)(A) unreasonable risk determination for processing PCE by repackaging – solvent for  
 10781 cleaning or degreasing; intermediate:

- 10782 • **Presents an unreasonable risk of injury to health (workers and occupational non-users (ONUs)).**
- 10783
- 10784 • Does not present an unreasonable risk of injury to the environment (aquatic organisms).
- 10785

10786 Unreasonable risk driver – workers:

- 10787 • Neurotoxicity resulting from chronic dermal exposures.
- 10788 • Cancer resulting from chronic dermal exposures.
- 10789

10790 Unreasonable risk driver – ONUs:

- 10791 • Neurotoxicity resulting from chronic inhalation exposures.
- 10792

10793 Driver benchmarks – workers and ONUs:

- 10794 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 10795 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .
- 10796

10797 Risk estimate - workers:

- 10798 • Neurotoxicity:

- Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF = 20). (Table 4-69)

Risk estimate – ONUs:

- Neurotoxicity:
  - Chronic inhalation MOE 52 (central tendency). (Table 4-8)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), the dermal chronic non-cancer risk estimate (high-end) indicates risk even with assumed dermal protection (PF 20). Risk estimates for ONUs for chronic inhalation exposures indicated non-cancer risk at the central tendency, while acute inhalation exposures did not indicate risk. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk.

While EPA identified environmental risks for this COU, given the uncertainties in the data, EPA does not consider these risks unreasonable. Of the four facilities assessed as importing or repackaging PCE, a single facility had releases indicating risk to aquatic organisms ( $RQ \geq 1$  and 20 days or more of exceedance for algae). RQ values were 20.62 (230 days of exceedance, indirect release) and 256.8 (20 days of exceedance, indirect release). Industrial wastewater or liquid wastes may be treated on-site and then released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80% removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water. The exceedance occurred for indirect release. An exceedance from indirect release indicates that risk can exist even with waste water treatment if the rate of PCE release to surface water is high. One of the facilities assessed as manufacturing PCE did not have NPDES permits. EPA only identified risk to algae from the one facility lacking a NPDES permit. Lack of a NPDES permit increases the uncertainty in the surface water release estimate for a facility. Based on the surface water PCE concentration and COC confidence levels, the overall confidence in the risk estimate to aquatic organisms from exposure to PCE is medium.

Life Cycle Stage	Category	Subcategory
Processing	Repackaging	<ul style="list-style-type: none"> <li>• Solvent for cleaning or degreasing</li> <li>• Intermediate</li> </ul>

**5.3.9 Processing – Recycling**

Section 6(b)(4)(A) unreasonable risk determination for processing PCE by recycling:

- **Presents an unreasonable risk of injury to health (workers).**
- **Presents an unreasonable risk to the environment (aquatic organisms).**
- Does not present an unreasonable risk of injury to health (occupational non-users).

10840 Unreasonable risk driver – workers and aquatic organisms:

- 10841 • Neurotoxicity resulting from chronic dermal exposures.
- 10842 • Cancer resulting from chronic dermal exposures.
- 10843 • Growth effects to aquatic invertebrates from chronic exposure.
- 10844 • Algae mortality from exposure.

10845  
10846 Driver benchmarks – workers and aquatic organisms:

- 10847 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 10848 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .
- 10849 • Mortality: Algae RQ  $\geq 1$ .

10850  
10851 Risk estimate - workers:

- 10852 • Neurotoxicity:
  - 10853 ○ Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF
  - 10854 = 20). (Table 4-69)

10855  
10856 Risk estimate for facilities with exceedances – aquatic organisms: (Table 4-110)

- 10857 • Algae mortality from exposure: (some facilities had exceedances for multiple scenarios)
  - 10858 ○ RQ = 6.4 (algae, 172 days of exceedance, indirect release).
  - 10859 ○ RQ = 80 (algae, 20 days of exceedance, indirect release).
  - 10860 ○ RQ = 25 (algae, 235 days of exceedance, indirect release).
  - 10861 ○ RQ = 311 (algae, 20 days of exceedance, indirect release).
  - 10862 ○ RQ = 2.2 (algae, 90 days of exceedance, indirect release).

10863  
10864 Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures  
10865 do not indicate risks with assumed respiratory protection (APF 25), the dermal chronic non-cancer risk  
10866 estimate (high-end) indicates risk even with assumed dermal protection (PF 20). Risk estimates for  
10867 ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency. EPA did  
10868 not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk  
10869 estimate since the data did not distinguish between worker and ONU inhalation exposure estimates.  
10870 ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly  
10871 handling the chemical substance; however, the relative exposure of ONUs to workers in these cases  
10872 cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate  
10873 when determining ONU risk.

10874  
10875 Environmental releases for this condition of use indicate chronic risk to aquatic organisms and risk to  
10876 algae. Of the 13 facilities assessed for the waste handling, disposal, treatment, and recycling of PCE,  
10877 three facilities had releases indicating risk to aquatic organisms (RQs  $\geq 1$  and 20 days of exceedance for  
10878 algae). RQ values ranged from 2.2 (90 days of exceedance, indirect discharge) to 311 (20 days of  
10879 exceedance, indirect discharge). Industrial wastewater or liquid wastes may be treated on-site and then  
10880 released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge).  
10881 EPA estimated 80% removal of PCE from indirect discharging facilities and 0% removal for direct  
10882 releases to surface water. Exceedances occurred using indirect release scenarios. An exceedance from  
10883 indirect release indicates that risk can exist even with waste water treatment if the rate of PCE release to  
10884 surface water is high. Four of the 13 facilities assessed for the waste handling, disposal, treatment, and  
10885 recycling of PCE did not have NPDES permits. EPA identified risk to algae from indirect release of  
10886 PCE to surface water from one of the facilities without a NPDES permit. Lack of a NPDES permit



10887 increases the uncertainty in the surface water release estimate for a facility. Based on the surface water  
 10888 PCE concentration and COC confidence levels, the overall confidence in the risk estimate to aquatic  
 10889 organisms from exposure to PCE is medium.  
 10890

Life Cycle Stage	Category	Subcategory
Processing	Recycling	Recycling

10891  
 10892 **5.3.10 Distribution in Commerce**  
 10893

---

10894 Section 6(b)(4)(A) unreasonable risk determination of distribution of PCE in commerce:

- 10895 1 Does not present an unreasonable risk of injury to health (workers and occupational non-users).
- 10896 2 Does not present unreasonable risk to the environment (aquatic organisms).

10897  
 10898 Risk Considerations: A quantitative evaluation of the distribution of PCE was not included in the risk  
 10899 evaluation because exposures and releases from distribution were considered within each condition of  
 10900 use.  
 10901

Life Cycle Stage	Category	Subcategory
Distribution in commerce	Distribution	Distribution

10902  
 10903 **5.3.11 Industrial Use – Solvents (for cleaning or degreasing) – Batch vapor degreaser**  
 10904 **(open-top)**  
 10905

---

10906 Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE as a solvent (for cleaning  
 10907 or degreasing) – batch vapor degreaser (open-top):

- 10908 • **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- 10909 • Does not present unreasonable risk to the environment (aquatic organisms).

10910  
 10911 Unreasonable risk driver – workers:

- 10912 • Neurotoxicity resulting from acute and chronic inhalation and chronic dermal exposures.
- 10913 • Cancer resulting from chronic inhalation and dermal exposures.

10914  
 10915 Unreasonable risk driver – ONUs:

- 10916 • Neurotoxicity resulting from acute and chronic inhalation exposures.
- 10917 • Cancer resulting from chronic inhalation exposures.

10918  
 10919 Driver benchmarks – workers and ONUs:

- 10920 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 10921 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 10922 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

10923  
 10924 Risk estimate - workers:

- 10925 • Neurotoxicity:
  - 10926 ○ Acute inhalation MOEs 60 and 3.9 (central tendency and high-end) with PPE (respirator
  - 10927 APF 25). (Table 4-16)
  - 10928 ○ Chronic inhalation MOEs 271 and 18 (central tendency and high-end) with PPE
  - 10929 (respirator APF 25). (Table 4-17)
  - 10930 ○ Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF =
  - 10931 10). (Table 4-72)
- 10932 • Cancer (liver tumors):
  - 10933 ○ Inhalation: 1.5E-05 and 3.0E-04 (central tendency and high-end) with PPE (respirator
  - 10934 APF 25). (Table 4-18)
  - 10935 ○ Dermal: 6.4E-05 and 2.5E-04 (central tendency and high-end) with PPE (gloves PF =
  - 10936 10). (
  - 10937 ○ Table 4-73)

10938  
10939 Risk estimate – ONUs:

- 10940 • Neurotoxicity:
  - 10941 ○ Acute inhalation MOEs 8.2 and 1.0 (central tendency and high-end). (Table 4-16)
  - 10942 ○ Chronic inhalation MOEs 38 and 4.4 (central tendency and high-end). (Table 4-17)
- 10943 • Cancer (liver tumors):
  - 10944 ○ Inhalation: 1.1E-04 and 1.2E-03 (central tendency and high-end). (Table 4-18)

10945  
10946 Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition  
10947 of use indicate risk in the absence of PPE. For workers, non-cancer and cancer risk estimates for  
10948 inhalation and dermal exposures indicate risks even with assumed respiratory protection (APF 25) and  
10949 dermal protection (PF 10). EPA separately calculated risk estimates for ONUs and workers based on  
10950 monitoring data. Risk estimates for ONUs for acute (high-end), chronic (high-end and central tendency),  
10951 and cancer (high-end) inhalation exposures indicate risk. EPA defined ONU as an employee who does  
10952 not regularly handle PCE or operate the degreaser but performs work in the area around the degreaser.  
10953 Samples from employees determined not to be operating the degreasing equipment were designated as  
10954 ONU samples. EPA identified inhalation exposure monitoring data from NIOSH investigations at five  
10955 sites using PCE as a degreasing solvent in OTVDs. Due to the large variety in shop types that may use  
10956 PCE as a vapor degreasing solvent, there is some uncertainty in how representative these data are of a  
10957 “typical” shop.

10958  
10959 While EPA identified environmental risk for this COU, given the uncertainties in the data, EPA does not  
10960 consider these risks unreasonable. Of the 17 facilities assessed for this COU, two facilities had releases  
10961 indicating risk to risk to aquatic organisms (RQs  $\geq 1$  and 20 days or more of exceedance for algae). RQ  
10962 values ranged from 2.3 (20 days of exceedance, direct discharge) to 55.5 (20 days of exceedance, direct  
10963 discharge). Industrial wastewater or liquid wastes may be treated on-site and then released to surface  
10964 water (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80%  
10965 removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water.  
10966 The exceedance occurred for direct release. All of the facilities assessed as using PCE in open top vapor  
10967 degreasing had NPDES permits. Based on the surface water PCE concentration and COC confidence  
10968 levels, the overall confidence in the risk estimate to aquatic organisms from exposure to PCE is medium.  
10969

Life Cycle Stage	Category	Subcategory
Industrial use	Solvents (for cleaning or degreasing)	Batch vapor degreaser (e.g., open-top, closed-loop)

**5.3.12 Industrial Use – Solvents (for cleaning or degreasing) – Batch vapor degreaser (closed-loop)**

---

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE as a solvent (for cleaning or decreasing) – batch vapor degreaser (closed-loop):

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-72)
- Cancer (liver tumors):
  - Dermal: 6.4E-05 and 2.5E-04 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-73)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer (high-end and central tendency) and dermal cancer risk estimates (high-end) indicate risks even with assumed dermal protection (PF 10). EPA separately calculated risk estimates for ONUs and workers based on monitoring data. Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency or high-end. Worker samples were determined to be any sample taken on a person while performing the degreasing tasks. ONUs samples were determined to be any sample taken on a person in the same location as the degreaser but not performing the degreasing themselves. EPA identified inhalation exposure monitoring data from NIOSH investigations at two sites using PCE as a degreasing solvent in batch closed-loop vapor degreasers. Due to the large variety in shop types that may use PCE as a vapor degreasing solvent, there is some uncertainty in how representative these data are of a “typical” shop. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Solvents (for cleaning or degreasing)	Batch vapor degreaser (e.g., open-top, closed-loop)

11011  
11012  
11013 **5.3.13 Industrial Use – Solvents (for cleaning or degreasing) – In-line vapor degreaser**  
11014 **(conveyorized)**

---

11015  
11016 Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE as a solvent (for cleaning  
11017 or degreasing) – in-line vapor degreaser (conveyorized):

- 11018 • **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- 11019 • Does not present unreasonable risk to the environment (aquatic organisms).

11020  
11021 Unreasonable risk driver – workers:

- 11022 • Neurotoxicity resulting from acute and chronic inhalation and chronic dermal exposures.
- 11023 • Cancer resulting from chronic inhalation and dermal exposures.

11024  
11025 Unreasonable risk driver – ONUs:

- 11026 • Neurotoxicity resulting from acute and chronic inhalation exposures.
- 11027 • Cancer resulting from chronic inhalation exposures.

11028  
11029 Driver benchmarks – workers and ONUs:

- 11030 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 11031 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 11032 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

11033  
11034 Risk estimate - workers:

- 11035 • Neurotoxicity:
  - 11036 ○ Acute inhalation MOEs 1.6 and 0.7 (central tendency and high-end) with PPE (respirator
  - 11037 APF 25). (Table 4-22)
  - 11038 ○ Chronic inhalation MOEs 7.3 and 3.1 (central tendency and high-end) with PPE
  - 11039 (respirator APF 25). (Table 4-23)
  - 11040 ○ Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF =
  - 11041 10). (Table 4-72)
- 11042 • Cancer (liver tumors):
  - 11043 ○ Inhalation: 5.4E-04 and 1.4E-03 (central tendency and high-end) with PPE (respirator
  - 11044 APF 25). (Table 4-24)

11045 **Dermal: 6.4E-05 and 2.5E-04 (central tendency and high-end) with PPE (gloves PF = 10).** (

- 11046 ○ Table 4-73)

11047  
11048 Risk estimate – ONUs:

- 11049 • Neurotoxicity:
  - 11050 ○ Acute inhalation MOEs 0.1 and 4.0E-02 (central tendency and high-end). (Table 4-22)
  - 11051 ○ Chronic inhalation MOEs 0.6 and 0.2 (central tendency and high-end). (Table 4-23)
- 11052 • Cancer (liver tumors):

- Inhalation: 7.0E-03 and 2.3E-02 (central tendency and high-end). (Table 4-24)

Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of PPE. For workers, non-cancer and cancer risk estimates for inhalation and dermal exposures indicate risks even with assumed respiratory protection (APF 25) and dermal protection (PF 10). EPA separately calculated risk estimates for ONUs and workers. Risks for ONUs for acute, chronic, and cancer inhalation exposures are indicated at the high-end and central tendency estimates. EPA assessed inhalation exposures during conveyORIZED degreasing using the ConveyORIZED Degreasing Near-Field/Far-Field Inhalation Exposure Model. Workers' risk estimates are based on concentrations in the near-field where the conveyORIZED degreasing work occurs, and ONU exposures are based on concentrations in the far-field, away from the conveyORIZED degreaser. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Solvents (for cleaning or degreasing)	In-line vapor degreaser (e.g., conveyORIZED, web cleaner)

**5.3.14 Industrial Use – Solvents (for cleaning or degreasing) – In-line vapor degreaser (web degreaser)**

---

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE as a solvent (for cleaning or decreasing) – in-line vapor degreaser (web degreaser):

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from acute and chronic inhalation exposures.
- Cancer resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-72)
- Cancer (liver tumors):

- Dermal: 6.4E-05 and 2.5E-04 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-73)

Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 16 and 4.3 (central tendency and high-end). (Table 4-25)
  - Chronic inhalation MOEs 71 and 19 (central tendency and high-end). (Table 4-26)
- Cancer (liver tumors):
  - Inhalation: 5.5E-05 and 2.1E-04 (central tendency and high-end). (Table 4-27)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer (high-end and central tendency) and dermal cancer risk estimates (high-end) indicate risk even with assumed dermal protection (PF 10). EPA separately calculated risk estimates for ONUs and workers. Risk estimates for ONUs for acute (high-end), chronic (high-end and central tendency), and cancer (high-end) inhalation exposures indicate risk. EPA assessed inhalation exposures during web degreasing using the Web Degreasing Near-Field/Far-Field Inhalation Exposure Model. Workers’ estimates are based on concentrations in the near-field where the web degreasing work occurs, and ONU exposures are based on concentrations in the far-field, away from the web degreaser. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Solvents (for cleaning or degreasing)	In-line vapor degreaser (e.g., conveyORIZED, web cleaner)

5.3.15 Industrial Use – Solvents (for cleaning or degreasing) – Cold cleaner

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE as a solvent (for cleaning or degreasing) – cold cleaner:

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from acute and chronic inhalation exposures.
- Cancer resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.

- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-72)
- Cancer (liver tumors):
  - Dermal:  $6.4 \times 10^{-5}$  and  $2.5 \times 10^{-4}$  (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-73)

Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 3.6 (central tendency). (Table 4-28) (monitoring)
  - Chronic inhalation MOEs 16 (central tendency). (Table 4-29) (monitoring)
- Cancer (liver tumors):
  - Inhalation:  $2.5 \times 10^{-4}$  (central tendency). (Table 4-30) (monitoring)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer (high-end and central tendency) and dermal cancer risk estimates (high-end) indicate risk even with assumed dermal protection (PF 10). Risks for ONUs for acute, chronic, and cancer inhalation exposures are indicated at the central tendency. For workers and ONUs, EPA used monitoring data to make the risk determination on the use of PCE in cold cleaners. While EPA modeled the use of PCE in cold cleaning, the model showed large variation in modeled results as a result of the large variation in unit emissions reported in NEI. There is uncertainty in the ONU risk estimate since the monitoring data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk from the monitoring data. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Solvents (for cleaning or degreasing)	Cold cleaner

**5.3.16 Industrial Use – Solvents (for cleaning or degreasing) – Aerosol spray degreaser/cleaner**

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE as a solvent (for cleaning or degreasing) – aerosol spray degreaser/cleaner:

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

11178 Unreasonable risk driver – workers:

- 11179 • Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- 11180 • Cancer resulting from chronic inhalation and dermal exposures.

11181  
11182 Unreasonable risk driver – ONUs:

- 11183 • Neurotoxicity resulting from acute and chronic inhalation exposures.
- 11184 • Cancer resulting from chronic inhalation exposures.

11185  
11186 Driver benchmarks – workers and ONUs:

- 11187 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 11188 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 11189 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

11190  
11191 Risk estimate - workers:

- 11192 • Neurotoxicity:
  - 11193 ○ Acute inhalation MOEs 3.5 and 0.6 (central tendency and high-end) without PPE. (Table
  - 11194 4-31) (monitoring)
  - 11195 ○ Chronic inhalation MOEs 16 and 2.9 (central tendency and high-end) without PPE.
  - 11196 (Table 4-32) (monitoring)
  - 11197 ○ Acute dermal MOEs 24 and 8.0 (central tendency and high-end) with PPE (gloves PF =
  - 11198 10). (Table 4-74)
  - 11199 ○ Chronic dermal MOEs 51 and 17 (central tendency and high-end) with PPE (gloves PF =
  - 11200 10). (Table 4-75)
- 11201 • Cancer (liver tumors):
  - 11202 ○ Inhalation:  $2.6 \times 10^{-4}$  and  $1.8 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table
  - 11203 4-33) (monitoring)
  - 11204 ○ Dermal:  $9.6 \times 10^{-4}$  and  $3.7 \times 10^{-3}$  (central tendency and high-end) with PPE (gloves PF =
  - 11205 10). (Table 4-76)

11206  
11207 Risk estimate – ONUs:

- 11208 • Neurotoxicity:
  - 11209 ○ Acute inhalation MOEs 50 and 6.8 (central tendency and high-end). (Table 4-31)
  - 11210 (modeling)
  - 11211 ○ Chronic inhalation MOEs 260 and 31 (central tendency and high-end). (Table 4-32)
  - 11212 (modeling)
- 11213 • Cancer (liver tumors):
  - 11214 ○ Inhalation:  $2.0 \times 10^{-5}$  and  $1.4 \times 10^{-4}$  (central tendency and high-end). (Table 4-33)
  - 11215 (modeling)

11216  
11217 Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition  
11218 of use indicate risk in the absence of PPE. While EPA does not assume routine use of PPE with this  
11219 exposure scenario, risk was still present to workers with APF 50 for acute and chronic inhalation. The  
11220 estimates based on monitoring data only include values for workers as monitoring data for ONUs were  
11221 not identified. To account for lack of monitoring data for ONUs, EPA considered risk estimates from  
11222 exposure modeling when determining ONU risk. The near-field/far-field exposure modeling  
11223 incorporates variability in the model input parameters and distinguishes between workers and ONUs.



Model results are generally higher than monitoring data; however, the monitoring data includes data from three sources that had concentrations of PCE in the aerosol formulation below the median value predicted by the model. EPA has a high level of confidence in the assessed exposure for this condition of use. EPA separately evaluated risks to consumers from dry cleaned articles as part of the COU, Consumer Use – Cleaning and furniture care products – Dry cleaning solvent, in Section 5.3.52. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Solvents (for cleaning or degreasing)	Aerosol spray degreaser/cleaner

### 5.3.17 Industrial Use – Solvents (for cleaning or degreasing) – Dry Cleaning and Spot Cleaning Post-2006 Dry Cleaning

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE as a solvent (for cleaning or degreasing) – dry cleaning and spot cleaning post-2006 dry cleaning:

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- Cancer resulting from chronic inhalation and dermal exposures.

Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from acute and chronic inhalation exposures.
- Cancer resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute inhalation MOEs 1.4 and 0.3 (central tendency and high-end) without PPE. (Table 4-34) (monitoring)
  - Chronic inhalation MOEs 6.1 and 1.0 (central tendency and high-end) without PPE. (Table 4-35) (monitoring)
  - Acute dermal MOEs 24 and 7.9 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-77)
  - Chronic dermal MOEs 50 and 17 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-78)
- Cancer (liver tumors):
  - Inhalation:  $6.8E-04$  and  $5.4E-03$  (central tendency and high-end) without PPE. (Table 4-36) (monitoring)

- Dermal: 9.8E-04 and 3.8E-03 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-79)

Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 30 and 2.1 (central tendency and high-end). (Table 4-34) (modeling)
  - Chronic inhalation MOEs 136 and 9.5 (central tendency and high-end). (Table 4-35) (modeling)
- Cancer (liver tumors):
  - Inhalation: 2.9E-05 and 4.3E-04 (central tendency and high-end). (Table 4-36) (modeling)

Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of respiratory PPE. While EPA does not assume routine use of respiratory PPE with this exposure scenario, risk was still present to workers with APF 50 for chronic inhalation at the high-end, for monitoring and modeled data. Because the monitoring data only contained one data point representing an ONU for this scenario, EPA made its determination on ONUs using modeled data. Modeled ONU exposures are based on concentrations in the far-field which corresponds to any area outside the near-field zones. Risk estimates for ONUs for acute (high-end), chronic (high-end and central tendency), and cancer (high-end) inhalation exposures indicate risk. EPA separately evaluated risks to consumers from dry cleaned articles as part of the COU, Consumer Use – Cleaning and furniture care products – Dry cleaning solvent, in Section 5.3.52. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Solvents (for cleaning or degreasing)	<ul style="list-style-type: none"> <li>• Dry cleaning solvent</li> <li>• Spot cleaner</li> </ul>

**5.3.18 Industrial Use – Solvents (for cleaning or degreasing) – Dry Cleaning and Spot Cleaning 4th/5th Gen Only Dry Cleaning**

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Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE as a solvent (for cleaning or degreasing) – dry cleaning and spot cleaning 4th/5th Gen only dry cleaning:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- Cancer resulting from chronic inhalation and dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute inhalation MOEs 5.1 and 0.9 (central tendency and high-end) without PPE. (Table 4-34) (monitoring)
  - Chronic inhalation MOEs 23 and 3.5 (central tendency and high-end) without PPE. (Table 4-35) (monitoring)
  - Acute dermal MOEs 24 and 7.9 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-77)
  - Chronic dermal MOEs 50 and 17 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-78)
- Cancer (liver tumors):
  - Inhalation:  $1.8 \times 10^{-4}$  and  $1.5 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-36) (monitoring)
  - Dermal:  $9.8 \times 10^{-4}$  and  $3.8 \times 10^{-3}$  (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-79)

Risk Considerations: For workers, all pathways of occupational exposure for this condition of use indicate risk in the absence of respiratory PPE. Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency and high-end. EPA based its risk determination on monitoring data. EPA does not assume routine use of respiratory PPE with this exposure scenario. When comparing the model results to the fourth/fifth generation monitoring data results for workers, the model high-end and central tendency are both an order of magnitude greater than the monitoring data. This is expected as the model captures exposures from facilities with third and fourth/fifth generation machines. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Solvents (for cleaning or degreasing)	<ul style="list-style-type: none"> <li>• Dry cleaning solvent</li> <li>• Spot cleaner</li> </ul>

**5.3.19 Industrial Use – Lubricants and greases – Lubricants and greases (aerosol lubricants)**

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE in lubricants and greases – lubricants and greases (aerosol lubricants):

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- Cancer resulting from chronic inhalation and dermal exposures.

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Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from acute and chronic inhalation exposures.
- Cancer resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute inhalation MOEs 3.5 and 0.6 (central tendency and high-end) without PPE. (Table 4-31) (monitoring)
  - Chronic inhalation MOEs 16 and 2.9 (central tendency and high-end) without PPE. (Table 4-32) (monitoring)
  - Acute dermal MOEs 24 and 8.0 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-74)
  - Chronic dermal MOEs 51 and 17 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-75)
- Cancer (liver tumors):
  - Inhalation:  $2.6 \times 10^{-4}$  and  $1.8 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-33) (monitoring)
  - Dermal:  $9.6 \times 10^{-4}$  and  $3.7 \times 10^{-3}$  (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-76)

Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 50 and 6.8 (central tendency and high-end). (Table 4-31) (modeling)
  - Chronic inhalation MOEs 260 and 31 (central tendency and high-end). (Table 4-32) (modeling)
- Cancer (liver tumors):
  - Inhalation:  $2.0 \times 10^{-5}$  and  $1.4 \times 10^{-4}$  (central tendency and high-end). (Table 4-33) (modeling)

Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of respiratory PPE. While EPA does not assume routine use of PPE with this exposure scenario, risk was still present to workers with APF 50 for acute and chronic inhalation. The estimates based on monitoring data only include values for workers as monitoring data for ONUs were not identified. To account for lack of monitoring data for ONUs, EPA considered risk estimates from exposure modeling when determining ONU risk. The near-field/far-field exposure modeling incorporates variability in the model input parameters and distinguishes between workers and ONUs. Model results are generally higher than monitoring data; however, the monitoring data includes data from three sources that had concentrations of PCE in the aerosol formulation below the median value predicted by the model. EPA has a high level of confidence in the assessed exposure for this condition of use. No environmental risks were identified for this COU.

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Life Cycle Stage	Category	Subcategory
Industrial use	Solvents (for cleaning or degreasing)	Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)

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**5.3.20 Industrial Use – Lubricants and greases – Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants)**

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Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE in lubricants and greases – lubricants and greases (e.g., penetrating lubricants, cutting tool coolants):

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- Does not present an unreasonable risk of injury to health (workers and occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

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Benchmarks – workers and ONUs:

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Risk estimate - workers:

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Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 869 and 239 (central tendency and high-end). (Table 4-46)
  - Chronic inhalation MOEs 3,960 and 1,087 (central tendency and high-end). (Table 4-47)
- Cancer (liver tumors):
  - Inhalation: 1.0E-06 and 4.9E-06 (central tendency and high-end). (Table 4-48)
  - Dermal: 6.4E-05 and 2.5E-04 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-82)

Risk Considerations: Risk estimates for workers and ONUs for acute and chronic exposures do not indicate acute or chronic risks from any route of exposure, including cancer risks, in the absence of

respiratory PPE and with assumed dermal protection (PF 10) for workers. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Lubricants and greases	Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants, aerosol lubricants)

**5.3.21 Industrial Use – Adhesives and sealants – Solvent-based adhesives and sealants**

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE in adhesives and sealants – solvent-based adhesives and sealants:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 96 and 32 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-84)
- Cancer (liver tumors):
  - Dermal:  $5.1 \times 10^{-5}$  and  $2.0 \times 10^{-4}$  (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-85)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer (high-end and central tendency) and dermal cancer risk estimates (high-end) indicate risk even with assumed dermal protection (PF 10). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency or high-end. EPA identified inhalation exposure monitoring data related to the use of PCE-based adhesives, sealants, paints, and coatings. The results in the monitoring data only include values for workers as monitoring data for ONUs were not identified. To account for

11476 this uncertainty when using monitoring data, EPA considered the central tendency estimate when  
 11477 determining ONU risk. Due to the large variety in shop types that may use PCE-based adhesives and  
 11478 coatings, it is unclear how representative these data are of a “typical” site using these products. No  
 11479 environmental risks were identified for this COU.  
 11480

Life Cycle Stage	Category	Subcategory
Industrial use	Adhesives and sealant chemicals	Solvent-based adhesives and sealants

11481  
 11482 **5.3.22 Industrial Use – Paints and coatings – Solvent-based paints and coatings**  
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11484 Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE in paints and coatings –  
 11485 solvent-based paints and coatings:

- 11486 • **Presents an unreasonable risk of injury to health (workers).**
- 11487 • Does not present an unreasonable risk of injury to health (occupational non-users).
- 11488 • Does not present unreasonable risk to the environment (aquatic organisms).

11489 Unreasonable risk driver – workers:

- 11490 • Neurotoxicity resulting from chronic dermal exposures.
- 11491 • Cancer resulting from chronic dermal exposures.

11492  
 11493 Driver benchmarks – workers:

- 11494 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 11495 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

11496  
 11497 Risk estimate - workers:

- 11498 • Neurotoxicity:
  - 11499 ○ Chronic dermal MOEs 96 and 32 (central tendency and high-end) with PPE (gloves PF =
  - 11500 10). (Table 4-84)
- 11501 • Cancer (liver tumors):
  - 11502 ○ Dermal:  $5.1 \times 10^{-5}$  and  $2.0 \times 10^{-4}$  (central tendency and high-end) with PPE (gloves PF =
  - 11503 10). (Table 4-85)

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 11505 Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures  
 11506 do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer (high-  
 11507 end and central tendency) and dermal cancer risk estimates (high-end and central tendency) indicate risk  
 11508 even with assumed dermal protection (PF 10). Risk estimates for ONUs for acute and chronic inhalation  
 11509 exposures do not indicate risk at the central tendency. EPA identified inhalation exposure monitoring  
 11510 data related to the use of PCE-based adhesives, sealants, paints, and coatings. The results in the  
 11511 monitoring data only include values for workers as monitoring data for ONUs were not identified. ONU  
 11512 inhalation exposures are expected to be lower than inhalation exposures for workers directly handling  
 11513 the chemical substance but the relative exposure of ONUs to workers in these cases were not  
 11514 quantifiable. To account for this uncertainty when using monitoring data, EPA considered the central  
 11515 tendency estimate when determining ONU risk. Due to the large variety in shop types that may use

11516 PCE-based adhesives and coatings, it is unclear how representative these data are of a “typical” site  
 11517 using these products. No environmental risks were identified for this COU.  
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Life Cycle Stage	Category	Subcategory
Industrial use	Paints and coatings including paint and coating removers	Solvent-based paints and coatings, including for chemical milling

11519 **5.3.23 Industrial Use – Paints and coatings – Maskant for Chemical Milling**  
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11521 Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE in paints and coatings –  
 11522 maskant for chemical milling:

- 11523 • **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- 11524 • Does not present unreasonable risk to the environment (aquatic organisms).

11525  
 11526 Unreasonable risk driver – workers:

- 11527 • Neurotoxicity resulting from chronic dermal exposures.
- 11528 • Cancer resulting from chronic dermal exposures.

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 11530 Unreasonable risk driver – ONUs:

- 11531 • Neurotoxicity resulting from acute and chronic inhalation exposures.
- 11532 • Cancer resulting from chronic inhalation exposures.

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 11534 Driver benchmarks – workers and ONUs:

- 11535 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 11536 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 11537 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

11538  
 11539 Risk estimate - workers:

- 11540 • Neurotoxicity:
  - 11541 ○ Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF =
  - 11542 10). (Table 4-72)
- 11543 • Cancer (liver tumors):
  - 11544 ○ Dermal: 6.4E-04 and 2.5E-03 (central tendency and high-end) with PPE (gloves PF =
  - 11545 10). (
  - 11546 ○
  - 11547 ○ Table **4-73**)

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 11549 Risk estimate – ONUs:

- 11550 • Neurotoxicity:
  - 11551 ○ Acute inhalation MOEs 4.1 (central tendency). (Table 4-40)
  - 11552 ○ Chronic inhalation MOEs 19 (central tendency). (Table 4-41)
- 11553 • Cancer (liver tumors):

11554 **Inhalation: 2.2E-04 (central tendency).** (

- 11555 ○
- 11556 ○ Table 4-42)



**Risk Considerations:** For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer (high-end and central tendency) and dermal cancer risk estimates (high-end) indicate risk even with assumed dermal protection (PF 10). Risks for ONUs for acute, chronic, and cancer inhalation exposures are indicated at the central tendency. EPA identified inhalation exposure monitoring data from a single NIOSH investigation and samples collected by the DoD. EPA did not separately calculate risk estimates for ONUs and workers. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. Due to the variety in industry types and typical per site maskant use rates and the uncertainty of the PCE concentration in the maskant, it is unclear if these data are representative of a “typical” site. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Paints and coatings including paint and coating removers	Solvent-based paints and coatings, including for chemical milling

### 5.3.24 Industrial Use – Processing aids, not otherwise listed – Pesticide, fertilizer and other agricultural chemical manufacturing

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE in processing aids, not otherwise listed – pesticide, fertilizer and other agricultural chemical manufacturing:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-69)
- Cancer (liver tumors):
  - Dermal: 6.4E-04 and 2.5E-03 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-70)

11597 **Risk Considerations:** For workers, while non-cancer and cancer risk estimates for inhalation exposures  
 11598 do not indicate risks with assumed respiratory protection (APF 25), dermal chronic cancer and non-  
 11599 cancer risk estimates (high-end and central tendency) indicate risk even with assumed dermal protection  
 11600 (PF 10). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the  
 11601 central tendency. EPA identified inhalation exposure monitoring data from four studies submitted to  
 11602 EPA. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the  
 11603 ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure  
 11604 estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers  
 11605 directly handling the chemical substance; however, the relative exposure of ONUs to workers in these  
 11606 cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency  
 11607 estimate when determining ONU risk. No environmental risks were identified for this COU.  
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Life Cycle Stage	Category	Subcategory
Industrial use	Processing aids, not otherwise listed	Pesticide, fertilizer, and other agricultural chemical manufacturing

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 11611 **5.3.25 Industrial Use – Processing aids, specific to petroleum production – Catalyst**  
 11612 **regeneration in petrochemical manufacturing**

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11613  
 11614 Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE as a processing aids,  
 11615 specific to petroleum production – catalyst regeneration in petrochemical manufacturing processing aid:

- **Presents an unreasonable risk of injury to health (workers).**
- **Presents an unreasonable risk to the environment (aquatic organisms).**
- Does not present an unreasonable risk of injury to health (occupational non-users).

11619  
 11620 Unreasonable risk driver – workers and aquatic organisms:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.
- Algae mortality from exposure.

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 11625 Driver benchmarks – workers and aquatic organisms:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .
- Mortality: Algae RQ  $\geq 1$ .

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 11630 Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-69)
- Cancer (liver tumors):
  - Dermal: 6.4E-04 and 2.5E-03 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-70)

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 11638 Risk estimate for facilities with exceedances – aquatic organisms: (Table 4-110)

- Algae mortality from exposure: (some facilities had exceedances for multiple scenarios)
  - RQ = 1.9 (algae, 20 days of exceedance, direct release).
  - RQ = 4 (algae, 55 days of exceedance, direct release).
  - RQ = 69 (algae, 20 days of exceedance, direct release).
  - RQ = 4.7 (algae, 20 days of exceedance, direct release).
  - RQ = 4.5 (algae, 92 days of exceedance, indirect release).
  - RQ = 14 (algae, 20 days of exceedance, direct release).
  - RQ = 8.5 (algae, 169 days of exceedance, direct release).
  - RQ = 1.3 (algae, 42 days of exceedance, direct release).

**Risk Considerations:** For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), dermal chronic cancer and non-cancer risk estimates (high-end and central tendency) indicate risk even with assumed dermal protection (PF 10). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency. EPA identified inhalation exposure monitoring data from four studies submitted to EPA. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. No environmental risks were identified for this COU.

Environmental releases for this condition of use indicate chronic risk to aquatic organisms and risk to algae. Of the 12 facilities assessed as using PCE as an industrial processing aid, six facilities had releases indicating risk to aquatic organisms (RQs  $\geq 1$  and 20 days or more of exceedance for algae). RQ values ranged from 1.3 (42 days of exceedance, direct discharge) to 69 (20 days of exceedance, direct discharge). Industrial wastewater or liquid wastes may be treated on-site and then released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge). EPA estimated 80% removal of PCE from indirect discharging facilities and 0% removal for direct releases to surface water. Exceedances occurred using direct and indirect release scenarios but were highest for direct release scenarios. All of the facilities assessed as processing PCE as a reactant had NPDES permits. Based on the surface water PCE concentration and COC confidence levels, the overall confidence in the risk estimate to aquatic organisms from exposure to PCE is medium.

Life Cycle Stage	Category	Subcategory
Industrial use	Processing aids, specific to petroleum production	Catalyst regeneration in petrochemical manufacturing

### 5.3.26 Industrial Use – Other uses – Textile processing (spot cleaning)

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE for other uses – textile processing (spot cleaning):

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

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Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute dermal MOEs 24 and 7.9 (central tendency and high-end) with PPE (gloves PF = 10) (Table 4-77)
  - Chronic dermal MOEs 50 and 17 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-78)
- Cancer (liver tumors):
  - Dermal:  $9.8 \times 10^{-4}$  and  $3.8 \times 10^{-3}$  (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-79)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks, dermal acute non-cancer (high-end), dermal chronic non-cancer (high-end and central tendency), and dermal cancer risk estimates (high-end) indicate risk even with assumed dermal protection (PF 10). EPA does not assume routine use of respiratory PPE with this exposure scenario. EPA separately calculated risk estimates for ONUs and workers based on monitoring data. Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk. EPA identified inhalation exposure monitoring data from a single NIOSH investigation at a garment manufacturer. Worker samples were determined to be any sample taken on a person while directly handling PCE. ONUs samples were determined to be any sample taken on a person in the same location as the PCE use but not handling PCE. ONU exposure data did not distinguish central tendency and high-end. There is some uncertainty in how representative this data are of exposure at other facilities performing carpet cleaning or spot remover tasks. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Other uses	Textile processing

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**5.3.27 Industrial Use – Other uses – Textile processing (other)**

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE for other uses – textile processing (other):

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

11723  
11724 Unreasonable risk driver – workers:

- 11725 • Neurotoxicity resulting from chronic dermal exposures.
- 11726 • Cancer resulting from chronic dermal exposures.

11727  
11728 Driver benchmarks – workers:

- 11729 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 11730 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

11731  
11732 Risk estimate - workers:

- 11733 • Neurotoxicity:
  - 11734 ○ Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF =
  - 11735 10). (Table 4-69)
- 11736 • Cancer (liver tumors):
  - 11737 ○ Dermal:  $6.4 \times 10^{-4}$  and  $2.5 \times 10^{-3}$  (central tendency and high-end) with PPE (gloves PF =
  - 11738 10). (Table 4-70)

11740 Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures  
11741 do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer (high-  
11742 end and central tendency) and dermal cancer risk estimates (high-end) indicate risk even with assumed  
11743 dermal protection (PF 10). Risk estimates for ONUs for acute and chronic inhalation exposures do not  
11744 indicate risk at the central tendency. EPA did not identify any inhalation exposure monitoring data for  
11745 other industrial uses, and therefore assessed inhalation exposures for workers and ONUs using the Tank  
11746 Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model. Due to other  
11747 potential sources of exposure at industrial facilities, there are some model uncertainties that could result  
11748 in an underestimate of worker exposure. EPA did not separately calculate risk estimates for ONUs and  
11749 workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between  
11750 worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower  
11751 than inhalation exposures for workers directly handling the chemical substance; however, the relative  
11752 exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA  
11753 considered the central tendency estimate when determining ONU risk. No environmental risks were  
11754 identified for this COU.  
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Life Cycle Stage	Category	Subcategory
Industrial use	Other uses	Textile processing

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11759 **5.3.28 Industrial Use – Other uses – Wood furniture manufacturing**

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11761 Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE for other uses – wood  
11762 furniture manufacturing:

- 11763 • **Presents an unreasonable risk of injury to health (workers).**
- 11764 • Does not present an unreasonable risk of injury to health (occupational non-users).

- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-69)
- Cancer (liver tumors):
  - Dermal: 6.4E-04 and 2.5E-03 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-70)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer (high-end and central tendency) and dermal cancer risk estimates (high-end) indicate risk even with assumed dermal protection (PF 10). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency. EPA did not identify any inhalation exposure monitoring data for other industrial uses, and therefore assessed inhalation exposures for workers and ONUs using the Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model. Due to other potential sources of exposure at industrial facilities, there are some model uncertainties that could result in an underestimate of worker exposure. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial use	Other uses	Wood furniture manufacturing

**5.3.29 Industrial Use – Other uses – Laboratory chemicals**

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE for other uses - laboratory chemical:

- Does not present an unreasonable risk of injury to health (workers and ONUs).
- Does not present unreasonable risk to the environment (aquatic organisms).

**Risk Considerations:** As discussed in Section 2.4.1.25, EPA does not have data to assess worker exposures to PCE during laboratory use. However, due to the expected safety practices when using chemicals in a laboratory setting, PCE is expected to be applied in small amounts under a fume hood, thus reducing the potential for inhalation exposures. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial/commercial use	Other uses	Laboratory chemicals

### 5.3.30 Industrial Use – Other uses – Foundry applications

Section 6(b)(4)(A) unreasonable risk determination for industrial use of PCE for other uses – foundry applications:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Chronic dermal MOEs 77 and 26 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-69)
- Cancer (liver tumors):
  - Dermal: 6.4E-04 and 2.5E-03 (central tendency and high-end) with PPE (gloves PF = 10). (Table 4-70)

**Risk Considerations:** For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer (high-end and central tendency) and dermal cancer risk estimates (high-end) indicate risk even with assumed dermal protection (PF 10). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency. EPA did not identify any inhalation exposure monitoring data for other industrial uses, and therefore assessed inhalation exposures for workers and ONUs using the Tank Truck and Railcar Loading and Unloading Release and Inhalation Exposure Model. Due to other potential sources of exposure at industrial facilities, there are some model uncertainties that could result in an underestimate of worker exposure. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower

than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Industrial/commercial use	Other uses	Foundry applications

### 5.3.31 Commercial Use – Cleaning and furniture care products – Cleaners and degreasers (other) (wipe cleaning)

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in cleaning and furniture care products – cleaners and degreasers (other)(wipe cleaning):

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- Cancer resulting from chronic inhalation and chronic dermal exposures.

Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from acute and chronic inhalation exposures.
- Cancer resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute inhalation MOEs 3.8E-02 and 2.2E-02 (central tendency and high-end) without PPE. (Table 4-49)
  - Chronic inhalation MOEs 0.2 and 0.1 (central tendency and high-end) without PPE. (Table 4-50)
  - Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-77)
  - Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table 4-78)
- Cancer (liver tumors):
  - Inhalation: 2.4E-02 and 5.3E-02 (central tendency and high-end) without PPE. (Table 4-51)
  - Dermal: 9.8E-04 and 3.8E-03 (central tendency and high-end) without PPE. (Table 4-79)



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Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 229 and 0.2 (central tendency and high-end). (Table 4-49)
  - Chronic inhalation MOEs 1043 and 1.0 (central tendency and high-end). (Table 4-50)
- Cancer (liver tumors):
  - Inhalation: 4.0E-06 and 5.4E-03 (central tendency and high-end). (Table 4-51)

Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of respiratory and dermal PPE. While EPA does not assume routine use of PPE with this exposure scenario, risk was still present to workers with APF 50 for chronic inhalation at the high-end. EPA identified inhalation exposure monitoring data from NIOSH investigations at two sites using PCE for wipe cleaning. EPA separately calculated risk estimates for ONUs and workers based on monitoring data. Due to the large variety in shop types that may use PCE as a wipe cleaning solvent, it is unclear how representative these data are of a “typical” shop. EPA does not have a model for estimating exposures from wipe cleaning; therefore, the assessment is based on the identified monitoring data. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Cleaning and furniture care products	Cleaners and degreasers (other) (wipe cleaning)

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**5.3.32 Commercial Use – Cleaning and furniture care products – Cleaners and degreasers (other) (Other Spot Cleaning/Spot Removers (Including Carpet Cleaning))**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in cleaning and furniture care products – cleaners and degreasers (other)(other spot cleaning/spot removers (including carpet cleaning)):

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:

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- Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-77)
- Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table 4-78)
- Cancer (liver tumors):
  - Dermal: 9.8E-04 and 3.8E-04 (central tendency and high-end) without PPE. (Table 4-79)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks, dermal acute non-cancer (high-end), dermal chronic non-cancer (high-end and central tendency), and dermal cancer risk estimates (high-end) indicate risk. EPA does not assume routine use of respiratory or dermal PPE with this exposure scenario. EPA separately calculated risk estimates for ONUs and workers based on monitoring data. Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk. EPA identified inhalation exposure monitoring data from a single NIOSH investigation at a garment manufacturer. Worker samples were determined to be any sample taken on a person while directly handling PCE. ONUs samples were determined to be any sample taken on a person in the same location as the PCE use but not handling PCE. ONU exposure data did not distinguish central tendency and high-end. There is some uncertainty in how representative this data are of exposure at other facilities performing carpet cleaning or spot remover tasks. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Cleaning and furniture care products	Cleaners and degreasers (other) (other spot cleaning/spot removers (including carpet cleaning))

**5.3.33 Commercial Use – Cleaning and furniture care products – Cleaners and degreasers (other) (Mold Release)**

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Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in cleaning and furniture care products – cleaners and degreasers (other) (mold release):

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic dermal exposures
- Cancer resulting from chronic dermal exposures

Driver benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate – workers:

- Neurotoxicity:
  - Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-77)
  - Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table 4-78)
- Cancer (liver tumors):
  - Dermal: 9.8E-04 and 3.8E-04 (central tendency and high-end) without PPE. (Table 4-79)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks, dermal acute non-cancer (high-end), dermal chronic non-cancer (high-end and central tendency), and dermal cancer risk estimates (high-end) indicate risk. EPA does not assume routine use of respiratory or dermal PPE with this exposure scenario. Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency. Data for this condition of use are area samples, not worker breathing zone samples. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Cleaning and furniture care products	Cleaners and degreasers (other) (mold release)

**5.3.34 Commercial Use – Cleaning and furniture care products – Dry Cleaning and Spot Cleaning Post-2006 Dry Cleaning**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in cleaning and furniture care products – dry cleaning and spot cleaning post-2006 dry cleaning:

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- Cancer resulting from chronic inhalation and dermal exposures.

Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from acute and chronic inhalation exposures.
- Cancer resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.

- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute inhalation MOEs 1.4 and 0.3 (central tendency and high-end) without PPE. (Table 4-34) (monitoring)
  - Chronic inhalation MOEs 6.1 and 1.0 (central tendency and high-end) without PPE. (Table 4-35) (monitoring)
  - Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-77)
  - Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table 4-78)
- Cancer (liver tumors):
  - Inhalation:  $6.8 \times 10^{-4}$  and  $5.4 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-36) (monitoring)
  - Dermal:  $9.8 \times 10^{-4}$  and  $3.8 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-79)

Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 30 and 2.1 (central tendency and high-end). (Table 4-34) (modeling)
  - Chronic inhalation MOEs 136 and 9.5 (central tendency and high-end). (Table 4-35) (modeling)
- Cancer (liver tumors):
  - Inhalation:  $2.9 \times 10^{-5}$  and  $4.3 \times 10^{-4}$  (central tendency and high-end). (Table 4-36) (modeling)

Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of respiratory and dermal PPE. While EPA does not assume routine use of respiratory PPE with this exposure scenario, risk was still present to workers with APF 50 for chronic inhalation at the high-end, for monitoring and modeled data. Because the monitoring data only contained one data point representing an ONU for this scenario, EPA made its determination on ONUs using modeled data. Modeled ONU exposures are based on concentrations in the far-field which corresponds to any area outside the near-field zones. Risk estimates for ONUs for acute (high-end), chronic (high-end and central tendency), and cancer (high-end) inhalation exposures indicate risk. EPA separately evaluated risks to consumers from dry cleaned articles as part of the COU, Consumer Use – Cleaning and furniture care products – Dry cleaning solvent, in Section 5.3.52. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Cleaning and furniture care products	Dry cleaning and spot cleaning post-2006 dry cleaning

12055 **5.3.35 Commercial Use – Cleaning and furniture care products – Dry Cleaning and Spot Cleaning**  
12056 **4<sup>th</sup>/5<sup>th</sup> Gen Only Dry Cleaning**

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12057  
12058 Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in cleaning and furniture  
12059 care products – dry cleaning and spot cleaning 4<sup>th</sup>/5<sup>th</sup> Gen only dry cleaning:

- 12060 • **Presents an unreasonable risk of injury to health (workers).**
- 12061 • Does not present an unreasonable risk of injury to health (occupational non-users).
- 12062 • Does not present unreasonable risk to the environment (aquatic organisms).

12063  
12064 Unreasonable risk driver – workers:

- 12065 • Neurotoxicity resulting from acute and chronic inhalation and chronic dermal exposures.
- 12066 • Cancer resulting from chronic inhalation and dermal exposures.

12067  
12068 Driver benchmarks – workers:

- 12069 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 12070 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 12071 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

12072  
12073 Risk estimate - workers:

- 12074 • Neurotoxicity:
  - 12075 ○ Acute inhalation MOEs 5.1 and 0.9 (central tendency and high-end) without PPE. (Table
  - 12076 4-34) (monitoring)
  - 12077 ○ Chronic inhalation MOEs 23 and 3.5 (central tendency and high-end) without PPE.
  - 12078 (Table 4-35) (monitoring)
  - 12079 ○ Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table
  - 12080 4-77)
  - 12081 ○ Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table
  - 12082 4-78)
- 12083 • Cancer (liver tumors):
  - 12084 ○ Inhalation:  $1.8 \times 10^{-4}$  and  $1.5 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table
  - 12085 4-36) (monitoring)
  - 12086 ○ Dermal:  $9.8 \times 10^{-4}$  and  $3.8 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-79)

12087  
12088 Risk Considerations: For workers, all pathways of occupational exposure for this condition of use  
12089 indicate risk in the absence of respiratory and dermal PPE. Risk estimates for ONUs for acute and  
12090 chronic inhalation exposures do not indicate risk at the central tendency and high-end. EPA based its  
12091 risk determination on monitoring data. When comparing the model results to the fourth/fifth generation  
12092 monitoring data results for workers, the model high-end and central tendency are both an order of  
12093 magnitude greater than the monitoring data. This is expected as the model captures exposures from  
12094 facilities with third and fourth/fifth generation machines. EPA separately evaluated risks to consumers  
12095 from dry cleaned articles as part of the COU, Consumer Use – Cleaning and furniture care products –  
12096 Dry cleaning solvent, in Section 5.3.52. No environmental risks were identified for this COU.  
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Life Cycle Stage	Category	Subcategory
Commercial Use	Cleaning and furniture care products	Dry cleaning and spot cleaning 4 <sup>th</sup> /5 <sup>th</sup> Gen only dry cleaning

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12100 **5.3.36 Commercial Use – Cleaning and furniture care products – Automotive care products (e.g.,**  
 12101 **engine degreaser and brake cleaner)**

12102

12103 Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in cleaning and furniture  
 12104 care products – automotive care products (e.g., engine degreaser and brake cleaner):

- 12105 • **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- 12106 • Does not present unreasonable risk to the environment (aquatic organisms).

12107

12108 Unreasonable risk driver – workers:

- 12109 • Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- 12110 • Cancer resulting from chronic inhalation and dermal exposures.

12111

12112 Unreasonable risk driver – ONUs:

- 12113 • Neurotoxicity resulting from acute and chronic inhalation exposures.
- 12114 • Cancer resulting from chronic inhalation exposures.

12115

12116 Driver benchmarks – workers and ONUs:

- 12117 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 12118 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 12119 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

12120

12121 Risk estimate - workers:

- 12122 • Neurotoxicity:
  - 12123 ○ Acute inhalation MOEs 3.5 and 0.6 (central tendency and high-end) without PPE. (Table
  - 12124 4-31) (monitoring)
  - 12125 ○ Chronic inhalation MOEs 16 and 2.9 (central tendency and high-end) without PPE.
  - 12126 (Table 4-32) (monitoring)
  - 12127 ○ Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE (Table
  - 12128 4-74)
  - 12129 ○ Chronic dermal MOEs 5.1 and 1.7 (central tendency and high-end) without PPE. (Table
  - 12130 4-75)
- 12131 • Cancer (liver tumors):
  - 12132 ○ Inhalation: 2.6E-04 and 1.8E-03 (central tendency and high-end) without PPE. (Table
  - 12133 4-33) (monitoring)
  - 12134 ○ Dermal: 9.6E-04 and 3.7E-03 (central tendency and high-end) without PPE. (Table 4-76)

12135

12136 Risk estimate – ONUs:

- 12137 • Neurotoxicity:
  - 12138 ○ Acute inhalation MOEs 50 and 6.8 (central tendency and high-end). (Table 4-31)
  - 12139 (modeling)

- Chronic inhalation MOEs 260 and 31 (central tendency and high-end). (Table 4-32) (modeling)
- Cancer (liver tumors):
  - Inhalation: 2.0E-05 and 1.4E-04 (central tendency and high-end). (Table 4-33) (modeling)

**Risk Considerations:** For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of respiratory and dermal PPE. While EPA does not assume routine use of PPE with this exposure scenario, risk was still present to workers with APF 50 for acute and chronic inhalation. The estimates based on monitoring data only include values for workers as monitoring data for ONUs were not identified. To account for lack of monitoring data for ONUs, EPA considered risk estimates from exposure modeling when determining ONU risk. The near-field/far-field exposure modeling incorporates variability in the model input parameters and distinguishes between workers and ONUs. Model results are generally higher than monitoring data; however, the monitoring data includes data from three sources that had concentrations of PCE in the aerosol formulation below the median value predicted by the model. EPA has a high level of confidence in the assessed exposure for this condition of use. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Cleaning and furniture care products	Automotive care products (e.g. engine degreaser and brake cleaner)

**5.3.37 Commercial Use – Cleaning and furniture care products – Aerosol cleaner**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in cleaning and furniture care products – aerosol cleaner:

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- Cancer resulting from chronic inhalation and dermal exposures.

Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from acute and chronic inhalation exposures.
- Cancer resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:

- Acute inhalation MOEs 3.5 and 0.6 (central tendency and high-end) without PPE. (Table 4-31) (monitoring)
- Chronic inhalation MOEs 16 and 2.9 (central tendency and high-end) without PPE. (Table 4-32) (monitoring)
- Acute dermal 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-74)
- Chronic dermal MOEs 5.1 and 1.7 (central tendency and high-end) without PPE. (Table 4-75)
- Cancer (liver tumors):
  - Inhalation: 2.6E-04 and 1.8E-03 (central tendency and high-end) without PPE. (Table 4-33) (monitoring)
  - Dermal: 9.6E-04 and 3.7E-04 (central tendency and high-end) without PPE. (Table 4-76)

Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 50 and 6.8 (central tendency and high-end). (Table 4-31) (modeling)
  - Chronic inhalation MOEs 260 and 31 (central tendency and high-end). (Table 4-32) (modeling)
- Cancer (liver tumors):
  - Inhalation: 2.0E-05 and 1.4E-04 (central tendency and high-end). (Table 4-33) (modeling)

Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of respiratory and dermal PPE. While EPA does not assume routine use of PPE with this exposure scenario, risk was still present to workers with APF 50 for acute and chronic inhalation. The estimates based on monitoring data only include values for workers as monitoring data for ONUs were not identified. To account for lack of monitoring data for ONUs, EPA considered risk estimates from exposure modeling when determining ONU risk. The near-field/far-field exposure modeling incorporates variability in the model input parameters and distinguishes between workers and ONUs. Model results are generally higher than monitoring data; however, the monitoring data includes data from three sources that had concentrations of PCE in the aerosol formulation below the median value predicted by the model. EPA has a high level of confidence in the assessed exposure for this condition of use. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Cleaning and furniture care products	Aerosol cleaner

**5.3.38 Commercial Use – Cleaning and furniture care products – Non-aerosol cleaner**

Section 6(b)(4)(A) unreasonable risk determination of PCE for commercial use – cleaning and furniture care products – non-aerosol cleaner:

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).



12223 Unreasonable risk driver – workers:

- 12224 • Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- 12225 • Cancer resulting from chronic inhalation and chronic dermal exposures.

12226  
12227 Unreasonable risk driver – ONUs:

- 12228 • Neurotoxicity resulting from acute and chronic inhalation exposures.
- 12229 • Cancer resulting from chronic inhalation exposures.

12230  
12231 Driver benchmarks – workers and ONUs:

- 12232 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 12233 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 12234 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

12235  
12236 Risk estimate - workers:

- 12237 • Neurotoxicity:
  - 12238 ○ Acute inhalation MOEs 3.8E-02 and 2.2E-02 (central tendency and high-end) without
  - 12239 PPE. (Table 4-49)
  - 12240 ○ Chronic inhalation MOEs 0.2 and 0.1 (central tendency and high-end) without PPE.
  - 12241 (Table 4-50)
  - 12242 ○ Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table
  - 12243 4-77)
  - 12244 ○ Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table
  - 12245 4-78)
- 12246 • Cancer (liver tumors):
  - 12247 ○ Inhalation: 2.4E-02 and 5.3E-02 (central tendency and high-end) without PPE. (Table
  - 12248 4-51)
  - 12249 ○ Dermal: 9.8E-04 and 3.8E-03 (central tendency and high-end) without PPE. (Table 4-79)

12250  
12251 Risk estimate – ONUs:

- 12252 • Neurotoxicity:
  - 12253 ○ Acute inhalation MOEs 229 and 0.2 (central tendency and high-end). (Table 4-49)
  - 12254 ○ Chronic inhalation MOEs 1043 and 1.0 (central tendency and high-end). (Table 4-50)
- 12255 • Cancer (liver tumors):
  - 12256 ○ Inhalation: 4.0E-06 and 5.4E-03 (central tendency and high-end). (Table 4-51)

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12258 Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition  
12259 of use indicate risk in the absence of PPE. While EPA does not assume routine use of PPE with this  
12260 exposure scenario, risk was still present to workers with APF 50 for chronic inhalation at the high-end.  
12261 EPA identified inhalation exposure monitoring data from NIOSH investigations at two sites using PCE  
12262 for wipe cleaning. EPA separately calculated risk estimates for ONUs and workers based on monitoring  
12263 data. Due to the large variety in shop types that may use PCE as a wipe cleaning solvent, it is unclear  
12264 how representative these data are of a “typical” shop. EPA does not have a model for estimating  
12265 exposures from wipe cleaning; therefore, the assessment is based on the identified monitoring data. No  
12266 environmental risks were identified for this COU.  
12267

Life Cycle Stage	Category	Subcategory
Commercial Use	Cleaning and furniture care products	Non-aerosol cleaner

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12270 **5.3.39 Commercial Use – Lubricants and greases – Lubricants and greases (aerosol lubricants)**

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12272 Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in lubricants and greases  
12273 – lubricants and greases (aerosol lubricants):

- 12274 • **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- 12275 • Does not present unreasonable risk to the environment (aquatic organisms).

12276

12277 Unreasonable risk driver – workers:

- 12278 • Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- 12279 • Cancer resulting from chronic inhalation and dermal exposures.

12280

12281 Unreasonable risk driver – ONUs:

- 12282 • Neurotoxicity resulting from acute and chronic inhalation exposures.
- 12283 • Cancer resulting from chronic inhalation exposures.

12284

12285 Driver benchmarks – workers and ONUs:

- 12286 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 12287 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 12288 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

12289

12290 Risk estimate - workers:

- 12291 • Neurotoxicity:
  - 12292 ○ Acute inhalation MOEs 3.5 and 0.6 (central tendency and high-end) without PPE. (Table
  - 12293 4-31) (monitoring)
  - 12294 ○ Chronic inhalation MOEs 16 and 2.9 (central tendency and high-end) without PPE.
  - 12295 (Table 4-32) (monitoring)
  - 12296 ○ Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table
  - 12297 4-74)
  - 12298 ○ Chronic dermal MOEs 5.1 and 1.7 (central tendency and high-end) without PPE. (Table
  - 12299 4-75)
- 12300 • Cancer (liver tumors):
  - 12301 ○ Inhalation:  $2.6 \times 10^{-4}$  and  $1.8 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table
  - 12302 4-33) (monitoring)
  - 12303 ○ Dermal:  $9.6 \times 10^{-4}$  and  $3.7 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-76)

12304

12305 Risk estimate – ONUs:

- 12306 • Neurotoxicity:
  - 12307 ○ Acute inhalation MOEs 50 and 6.8 (central tendency and high-end). (Table 4-31)
  - 12308 (modeling)

- Chronic inhalation MOEs 260 and 31 (central tendency and high-end). (Table 4-32) (modeling)
- Cancer (liver tumors):
  - Inhalation: 2.0E-05 and 1.4E-04 (central tendency and high-end). (Table 4-33) (modeling)

**Risk Considerations:** For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of PPE. While EPA does not assume routine use of PPE with this exposure scenario, risk was still present to workers with APF 50 for acute and chronic inhalation. The estimates based on monitoring data only include values for workers as monitoring data for ONUs were not identified. To account for lack of monitoring data for ONUs, EPA considered risk estimates from exposure modeling when determining ONU risk. The near-field/far-field exposure modeling incorporates variability in the model input parameters and distinguishes between workers and ONUs. Model results are generally higher than monitoring data; however, the monitoring data includes data from three sources that had concentrations of PCE in the aerosol formulation below the median value predicted by the model. EPA has a high level of confidence in the assessed exposure for this condition of use. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Lubricants and greases	Lubricants and greases (aerosol lubricants)

**5.3.40 Commercial Use – Lubricants and greases – Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants)**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in lubricants and greases – lubricants and greases (e.g., penetrating lubricants, cutting tool coolants):

- Does not present an unreasonable risk of injury to health (workers and occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute inhalation MOEs 869 and 239 (central tendency and high-end) without PPE. (Table 4-46)
  - Chronic inhalation MOEs 3,960 and 1,087 (central tendency and high-end) without PPE. (Table 4-47)
  - Acute dermal MOEs 181 and 60 (central tendency and high-end) with PPE (gloves PF = 5). (Table 4-80)

- Chronic dermal MOEs 384 and 128 (central tendency and high-end) with PPE (gloves PF = 5). (Table 4-81)
- Cancer (liver tumors):
  - Inhalation: 1.0E-06 and 4.9E-06 (central tendency and high-end) without PPE. (Table 4-48)
  - Dermal: 1.3E-05 and 5.0E-05 (central tendency and high-end) with PPE (gloves PF = 5). (Table 4-82)

Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 869 and 239 (central tendency and high-end). (Table 4-46)
  - Chronic inhalation MOEs 3,960 and 1,087 (central tendency and high-end). (Table 4-47)
- Cancer (liver tumors):
  - Inhalation: 1.0E-06 and 4.9E-06 (central tendency and high-end). (Table 4-48)

Risk Considerations: Risk estimates for workers and ONUs for acute and chronic exposures do not indicate acute or chronic risks from any route of exposure, including cancer risks. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial use	Lubricants and greases	Lubricants and greases (e.g., penetrating lubricants, cutting tool coolants)

**5.3.41 Commercial Use – Adhesives and sealant chemicals – Light repair adhesives**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in adhesives and sealant chemicals – light repair adhesives:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.

- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute dermal MOEs 15 and 4.9 (central tendency and high-end) with PPE (gloves PF = 5). (Table 4-83)
  - Chronic dermal MOEs 31 and 10 (central tendency and high-end) with PPE (gloves PF = 5). (Table 4-84)
- Cancer (liver tumors):
  - Dermal:  $1.6 \times 10^{-4}$  and  $6.1 \times 10^{-4}$  (central tendency and high-end) with PPE (gloves PF = 5). (Table 4-85)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 10), dermal chronic non-cancer (high-end and central tendency) and dermal cancer risk estimates (high-end) indicate risk even with assumed dermal protection (PF 5). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency or high-end. EPA identified inhalation exposure monitoring data related to the use of PCE-based adhesives, sealants, paints, and coatings. The results in the monitoring data only include values for workers as monitoring data for ONUs were not identified. To account for this uncertainty when using monitoring data, EPA considered the central tendency estimate when determining ONU risk. Due to the large variety in shop types that may use PCE-based adhesives and coatings, it is unclear how representative these data are of a “typical” site using these products. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial use	Adhesives and sealant chemicals	Light repair adhesives

**5.3.42 Commercial Use – Paints and coatings – Solvent-based paints and coatings**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in paints and coatings – solvent-based paints and coatings:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from chronic inhalation and acute and chronic dermal exposures.
- Cancer resulting from chronic inhalation and dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

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Risk estimate - workers:

- Neurotoxicity:
  - Chronic inhalation MOEs 976 and 50 (central tendency and high-end) with PPE (respirator APF 10). (Table 4-38)
  - Acute dermal MOEs 15 and 4.9 (central tendency and high-end) with PPE (gloves = 5). (Table 4-83)
  - Chronic dermal MOEs 31 and 10 (central tendency and high-end) with PPE (gloves PF = 5). (Table 4-84)
- Cancer (liver tumors):
  - Dermal: 1.6E-04 and 6.1E-04 (central tendency and high-end) with PPE (gloves PF = 5). (Table 4-85)

Risk Considerations: For workers, while acute non-cancer and cancer risk estimates for inhalation exposures do not indicate risks with assumed respiratory protection (APF 10), chronic non-cancer (high-end), dermal chronic non-cancer (high-end and central tendency) and dermal cancer risk estimates (high-end and central tendency) indicate risk even with assumed dermal protection (PF 5). Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central tendency. EPA identified inhalation exposure monitoring data related to the use of PCE-based adhesives, sealants, paints, and coatings. The results in the monitoring data only include values for workers as monitoring data for ONUs were not identified. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance but the relative exposure of ONUs to workers in these cases were not quantifiable. To account for this uncertainty when using monitoring data, EPA considered the central tendency estimate when determining ONU risk. Due to the large variety in shop types that may use PCE-based adhesives and coatings, it is unclear how representative these data are of a “typical” site using these products. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial use	Paints and coatings	Solvent-based paints and coatings

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**5.3.43 Commercial Use – Other uses – Carpet cleaning**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE for other uses – carpet cleaning:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic dermal exposures.
- Cancer resulting from chronic dermal exposures.

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Driver benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-77)
  - Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table 4-78)
- Cancer (liver tumors):
  - Dermal:  $9.8 \times 10^{-4}$  and  $3.8 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-79)

Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks, dermal acute non-cancer, dermal chronic non-cancer, and dermal cancer risk estimates (high-end and central tendency) indicate risk. EPA does not assume routine use of respiratory or dermal PPE with this exposure scenario. EPA separately calculated risk estimates for ONUs and workers based on monitoring data. Risk estimates for ONUs for acute and chronic inhalation exposures do not indicate risk. EPA identified inhalation exposure monitoring data from a single NIOSH investigation at a garment manufacturer. Worker samples were determined to be any sample taken on a person while directly handling PCE. ONU samples were determined to be any sample taken on a person in the same location as the PCE use but not handling PCE. ONU exposure data did not distinguish central tendency and high-end. There is some uncertainty in how representative this data are of exposure at other facilities performing carpet cleaning or spot remover tasks. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial use	Other uses	Carpet cleaning

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**5.3.44 Commercial Use – Other uses – Laboratory chemicals**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE for other uses – laboratory chemicals:

- Does not present an unreasonable risk of injury to health (workers and ONUs).
- Does not present unreasonable risk to the environment (aquatic organisms).

Risk Considerations: As discussed in Section 2.4.1.25, EPA does not have data to assess worker exposures to PCE during laboratory use. However, due to the expected safety practices when using chemicals in a laboratory setting, PCE is expected to be applied in small amounts under a fume hood,

12516 thus reducing the potential for inhalation exposures. No environmental risks were identified for this  
 12517 COU.  
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Life Cycle Stage	Category	Subcategory
Commercial use	Other uses	Laboratory Chemicals

12520

12521 **5.3.45 Commercial Use – Other uses – Metal (e.g., stainless steel) and stone polishes**  
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12523 Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE for other uses – metal  
 12524 (e.g., stainless steel) and stone polishes:

- 12525 • **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- 12526 • Does not present unreasonable risk to the environment (aquatic organisms).

12527  
 12528 Unreasonable risk driver – workers:

- 12529 • Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- 12530 • Cancer resulting from chronic inhalation and chronic dermal exposures.

12531  
 12532 Unreasonable risk driver – ONUs:

- 12533 • Neurotoxicity resulting from acute and chronic inhalation exposures.
- 12534 • Cancer resulting from chronic inhalation exposures.

12535  
 12536 Driver benchmarks – workers and ONUs:

- 12537 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 12538 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 12539 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

12540  
 12541 Risk estimate - workers:

- 12542 • Neurotoxicity:
  - 12543 ○ Acute inhalation MOEs 3.8E-02 and 2.2E-02 (central tendency and high-end) without
  - 12544 PPE. (Table 4-49)
  - 12545 ○ Chronic inhalation MOEs 0.2 and 0.1 (central tendency and high-end) without PPE.
  - 12546 (Table 4-50)
  - 12547 ○ Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table
  - 12548 4-77)
  - 12549 ○ Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table
  - 12550 4-78)
- 12551 • Cancer (liver tumors):
  - 12552 ○ Inhalation: 2.4E-02 and 5.3E-02 (central tendency and high-end) without PPE. (Table
  - 12553 4-51)
  - 12554 ○ Dermal: 9.8E-04 and 3.8E-03 (central tendency and high-end) without PPE. (Table 4-79)
  - 12555

12556 Risk estimate – ONUs:

- 12557 • Neurotoxicity:



- Acute inhalation MOEs 229 and 0.2 (central tendency and high-end). (Table 4-49)
- Chronic inhalation MOEs 1043 and 1.0 (central tendency and high-end). (Table 4-50)
- Cancer (liver tumors):
  - Inhalation: 4.0E-06 and 5.4E-03 (central tendency and high-end). (Table 4-51)

Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of PPE. While EPA does not assume routine use of PPE with this exposure scenario, risk was still present to workers with APF 50 for chronic inhalation at the high-end. EPA identified inhalation exposure monitoring data from NIOSH investigations at two sites using PCE for wipe cleaning. EPA separately calculated risk estimates for ONUs and workers based on monitoring data. Due to the large variety in shop types that may use PCE as a wipe cleaning solvent, it is unclear how representative these data are of a “typical” shop. EPA does not have a model for estimating exposures from wipe cleaning; therefore, the assessment is based on the identified monitoring data. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Other uses	Metal (e.g., stainless steel) and stone polishes

**5.3.46 Commercial Use – Other uses – Inks and ink removal products (based on printing)**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE in other uses – inks and ink removal products (based on printing):

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.
- Cancer resulting from chronic inhalation and dermal exposures.

Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from acute and chronic inhalation exposures.
- Cancer resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate – workers:

- Neurotoxicity:
  - Acute inhalation MOEs 2.6 and 0.8 (central tendency and high-end) without PPE. (Table 4-58)

- Chronic inhalation MOEs 12 and 3.8 (central tendency and high-end) without PPE. (Table 4-59)
- Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-77)
- Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table 4-78)
- Cancer (liver tumors):
  - Inhalation: 3.5E-04 and 1.4E-03 (central tendency and high-end) without PPE. (Table 4-60)
  - Dermal: 9.8E-04 and 3.8E-04 (central tendency and high-end) without PPE. (Table 4-79)

**Risk estimate – ONUs:**

- Neurotoxicity:
  - Acute inhalation MOEs 2.6 (central tendency). (Table 4-58)
  - Chronic inhalation MOEs 12 (central tendency). (Table 4-59)
- Cancer (liver tumors):
  - Inhalation: 3.5E-04 (central tendency). (Table 4-60)

**Risk Considerations:** For workers, all pathways of occupational exposure for this condition of use indicate risk (central tendency and high-end) in the absence of respiratory and dermal PPE. Acute, chronic, and cancer inhalation risk estimates for ONUs indicate risk at the central tendency. EPA does not assume routine use of respiratory or dermal PPE with this exposure scenario. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Other uses	Inks and ink removal products (based on printing)

**5.3.47 Commercial Use – Other uses – Inks and ink removal products (based on photocopying)**

**Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE for other uses – inks and ink removal products (based on photocopying):**

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

12641  
12642 Unreasonable risk driver – workers:

- 12643 • Neurotoxicity resulting from acute and chronic dermal exposures.
- 12644 • Cancer resulting from chronic dermal exposures.

12645  
12646 Driver benchmarks – workers:

- 12647 • Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- 12648 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 12649 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

12650  
12651 Risk estimate – workers:

- 12652 • Neurotoxicity:
  - 12653 ○ Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table
  - 12654 4-77)
  - 12655 ○ Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table
  - 12656 4-78)
- 12657 • Cancer (liver tumors):
  - 12658 ○ Dermal:  $9.8 \times 10^{-4}$  and  $3.8 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-79)

12660 Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures  
12661 do not indicate risks in the absence of respiratory PPE, dermal acute and chronic non-cancer (high-end  
12662 and central tendency), and dermal cancer (high-end) risk estimates indicate risk in the absence of dermal  
12663 PPE. EPA does not assume routine use of respiratory or dermal PPE with this exposure scenario. Risk  
12664 estimates for ONUs for acute and chronic inhalation do not indicate risk at the central tendency. EPA  
12665 did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk  
12666 estimate since the data did not distinguish between worker and ONU inhalation exposure estimates.  
12667 ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly  
12668 handling the chemical substance; however, the relative exposure of ONUs to workers in these cases  
12669 cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate  
12670 when determining ONU risk. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Other uses	Inks and ink removal products (based on photocopying)

12673  
12674 5.3.48 Commercial Use – Other uses – Welding

12675  
12676 Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE for other uses – welding:

- 12677 • **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- 12678 • Does not present unreasonable risk to the environment (aquatic organisms).

12679  
12680 Unreasonable risk driver – workers:

- 12681 • Neurotoxicity resulting from acute and chronic inhalation and dermal exposures.

- Cancer resulting from chronic inhalation and dermal exposures.

Unreasonable risk driver – ONUs:

- Neurotoxicity resulting from acute and chronic inhalation exposures.
- Cancer resulting from chronic inhalation exposures.

Driver benchmarks – workers and ONUs:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate - workers:

- Neurotoxicity:
  - Acute inhalation MOEs 3.5 and 0.6 (central tendency and high-end) without PPE. (Table 4-31) (monitoring)
  - Chronic inhalation MOEs 16 and 2.9 (central tendency and high-end) without PPE. (Table 4-32) (monitoring)
  - Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-74)
  - Chronic dermal MOEs 5.1 and 1.7 (central tendency and high-end) without PPE. (Table 4-75)
- Cancer (liver tumors):
  - Inhalation:  $2.6 \times 10^{-4}$  and  $1.8 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-33) (monitoring)
  - Dermal:  $9.6 \times 10^{-4}$  and  $3.7 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-76)

Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 50 and 6.8 (central tendency and high-end). (Table 4-31) (modeling)
  - Chronic inhalation MOEs 260 and 31 (central tendency and high-end). (Table 4-32) (modeling)
- Cancer (liver tumors):
  - Inhalation:  $2.0 \times 10^{-5}$  and  $1.4 \times 10^{-4}$  (central tendency and high-end). (Table 4-33) (modeling)

Risk Considerations: For workers and ONUs, all pathways of occupational exposure for this condition of use indicate risk in the absence of PPE. While EPA does not assume routine use of PPE with this exposure scenario, risk was still present to workers with APF 50 for acute and chronic inhalation. The estimates based on monitoring data only include values for workers as monitoring data for ONUs were not identified. To account for lack of monitoring data for ONUs, EPA considered risk estimates from exposure modeling when determining ONU risk. The near-field/far-field exposure modeling incorporates variability in the model input parameters and distinguishes between workers and ONUs. Model results are generally higher than monitoring data; however, the monitoring data includes data from three sources that had concentrations of PCE in the aerosol formulation below the median value predicted by the model. EPA has a high level of confidence in the assessed exposure for this condition of use. No environmental risks were identified for this COU.

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Life Cycle Stage	Category	Subcategory
Commercial Use	Other uses	Welding

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**5.3.49 Commercial Use – Other uses – Photographic film**

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Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE for other uses – photographic film:

- **Presents an unreasonable risk of injury to health (workers and occupational non-users).**
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic inhalation, and acute and chronic dermal exposures.
- Cancer resulting from chronic inhalation and chronic dermal exposures.

Driver benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate – workers:

- Neurotoxicity:
  - Acute inhalation MOEs 0.8 and 8.9E-02 (central tendency and high-end) without PPE. (Table 4-58)
  - Chronic inhalation MOEs 3.6 and 0.4 (central tendency and high-end) without PPE. (Table 4-59)
  - Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-77)
  - Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table 4-78)
- Cancer (liver tumors):
  - Inhalation: 1.1E-03 and 1.3E-02 (central tendency and high-end) without PPE. (Table 4-60)
  - Dermal: 9.8E-04 and 3.8E-03 (central tendency and high-end) without PPE. (Table 4-79)

Risk estimate – ONUs:

- Neurotoxicity:
  - Acute inhalation MOEs 0.8 (central tendency). (Table 4-58)
  - Chronic inhalation MOEs 3.6 (central tendency). (Table 4-59)
- Cancer (liver tumors):
  - Inhalation: 1.1E-03 (central tendency). (Table 4-60)

**Risk Considerations:** For workers, all pathways of occupational exposure for this condition of use indicate risk (central tendency and high-end) in the absence of respiratory and dermal PPE. EPA does not assume routine use of respiratory or dermal PPE with this exposure scenario. Risk estimates for ONUs for acute and chronic non-cancer and cancer inhalation exposures indicate risk at the central tendency EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Other uses	Photographic Film

**5.3.50 Commercial Use – Other uses – Mold cleaning, release and protectant products**

Section 6(b)(4)(A) unreasonable risk determination for commercial use of PCE for other uses – mold cleaning, release and protectant products:

- **Presents an unreasonable risk of injury to health (workers).**
- Does not present an unreasonable risk of injury to health (occupational non-users).
- Does not present unreasonable risk to the environment (aquatic organisms).

Unreasonable risk driver – workers:

- Neurotoxicity resulting from acute and chronic dermal exposures
- Cancer resulting from chronic dermal exposures

Driver benchmarks – workers:

- Neurotoxicity: Acute non-cancer benchmark MOE = 10.
- Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .

Risk estimate – workers:

- Neurotoxicity:
  - Acute dermal MOEs 2.4 and 0.8 (central tendency and high-end) without PPE. (Table 4-77)
  - Chronic dermal MOEs 5.0 and 1.7 (central tendency and high-end) without PPE. (Table 4-78)
- Cancer (liver tumors):
  - Dermal:  $9.8 \times 10^{-4}$  and  $3.8 \times 10^{-3}$  (central tendency and high-end) without PPE. (Table 4-79)

**Risk Considerations:** For workers, while non-cancer and cancer risk estimates for inhalation exposures do not indicate risks, dermal acute non-cancer (high-end), dermal chronic non-cancer (high-end and central tendency), and dermal cancer risk estimates (high-end) indicate risk. EPA does not assume routine use of respiratory or dermal PPE with this exposure scenario. Risk estimates for ONUs for acute

and chronic inhalation exposures do not indicate risk at the central tendency. Data for this condition of use are area samples, not worker breathing zone samples. ONU inhalation exposures are expected to be lower than inhalation exposures for workers directly handling the chemical substance; however, the relative exposure of ONUs to workers in these cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency estimate when determining ONU risk. No environmental risks were identified for this COU.

Life Cycle Stage	Category	Subcategory
Commercial Use	Other uses	Mold cleaning, release and protectant products

**5.3.51 Consumer Use – Cleaning and furniture care products – Cleaners and degreasers (other)**

Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in cleaning and furniture care products – cleaners and degreasers (other):

- **Presents an unreasonable risk of injury to health (consumers and bystanders).**

Unreasonable risk driver – consumers:

- Neurotoxicity resulting from acute inhalation and dermal exposures.

Unreasonable risk driver – bystanders:

- Neurotoxicity resulting from acute inhalation.

Driver benchmarks – consumers and bystanders:

- Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity:
  - Acute inhalation MOE 0.2 (moderate intensity user). (Table 4-86)
  - Acute dermal MOE 0.6 (moderate intensity user). (Table 4-87)

Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 0.8 (moderate intensity user). (Table 4-86)

Risk Considerations: All pathways of consumer and bystander exposure for this condition of use indicate risk. Consumer and bystander risk determinations reflect the effects associated with acute exposures. Risk estimates for consumer users at the medium intensity use scenarios of acute inhalation and dermal exposures indicate risk. For bystanders, the risk estimates for the medium intensity use scenario of acute inhalation indicate risk. Because bystanders are not expected to be dermally exposed to PCE, dermal risks to bystanders were not evaluated. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

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Life Cycle Stage	Category	Subcategory
Consumer use	Cleaning and furniture care products	Cleaners and degreasers (other)

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**5.3.52 Consumer Use – Cleaning and furniture care products – Dry cleaning solvent**

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Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in cleaning and furniture care products – dry cleaning solvent:

12860

- **Presents an unreasonable risk of injury to health (consumers).**

12861

- Does not present an unreasonable risk of injury to health (bystanders).

12862

12863

Unreasonable risk driver – consumers:

12864

- Neurotoxicity resulting from acute dermal exposures.

12865

12866

Driver benchmarks – consumers:

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- Neurotoxicity: Benchmark MOE = 10.

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Risk estimate – consumers:

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- Half-body acute dermal MOE 8.6 (Table 4-109, 1 day after dry cleaning, 2<sup>nd</sup> and 3<sup>rd</sup> generation).

12871

- Full-body acute dermal MOE 2.9, 3.7, and 4.9 (Table 4-109, 1, 2, and 3 days after dry cleaning, 2<sup>nd</sup> and 3<sup>rd</sup> generation).

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Risk Considerations: Consumer exposure to perchloroethylene due to off-gassing from recently dry cleaned articles was evaluated for two scenarios, direct dermal contact with clothing to consumers and inhalation exposure to bystanders from article storage in a home closet. Modeling was used to estimate dermal and inhalation exposures. Measurements of PCE concentrations in indoor air from storage of recently dry cleaned articles are in good agreement with modeling results. No direct measurements were found for consumer dermal exposure to PCE from dry cleaned fabrics. Dermal exposure due to direct skin contact with recently dry cleaned fabrics during article wear was assessed for consumer users, for older and more modern dry cleaning technologies (2<sup>nd</sup>-5<sup>th</sup> generation). Risk estimates for consumer users from articles dry cleaned with 2<sup>nd</sup> and 3<sup>rd</sup> generation machines indicate risk for half-body dermal exposure to dry cleaned clothing (1 day after dry cleaning) and for full-body dermal exposure (1, 2, and 3 days after dry cleaning). EPA did not find risk to bystanders.

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Life Cycle Stage	Category	Subcategory
Consumer use	Cleaning and furniture care products	Dry cleaning solvent

12887

**5.3.53 Consumer Use – Cleaning and furniture care products – Automotive care products (Brake cleaner)**

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12891 Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in cleaning and furniture  
 12892 care products – automotive care products (brake cleaner):

- 12893 • **Presents an unreasonable risk of injury to health (consumers and bystanders).**

12894  
 12895 Unreasonable risk driver – consumers:

- 12896 • Neurotoxicity resulting from acute inhalation and dermal exposures.

12897  
 12898 Unreasonable risk driver – bystanders:

- 12899 • Neurotoxicity resulting from acute inhalation.

12900  
 12901 Driver benchmarks – consumers and bystanders:

- 12902 • Neurotoxicity: Benchmark MOE = 10.

12903  
 12904 Risk estimate – consumers:

- 12905 • Neurotoxicity:
  - 12906 ○ Acute inhalation MOE 0.2 (moderate intensity user). (Table 4-88)
  - 12907 ○ Acute dermal MOE 0.6 (moderate intensity user). (Table 4-89)

12908  
 12909 Risk estimate – bystanders:

- 12910 • Neurotoxicity: Acute inhalation MOE 0.8 (moderate intensity user). (Table 4-88)

12911  
 12912 Risk Considerations: All pathways of consumer and bystander exposure for this condition of use  
 12913 indicate risk. Consumer and bystander risk determinations reflect the effects associated with acute  
 12914 exposures. Risk estimates for consumer users at the medium intensity use scenarios of acute inhalation  
 12915 and dermal exposures indicate risk. For bystanders, the risk estimates for the medium intensity use  
 12916 scenario of acute inhalation indicate risk. Because bystanders are not expected to be dermally exposed to  
 12917 PCE, dermal risks to bystanders were not evaluated. For the consumer exposure scenario for bystanders,  
 12918 inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to  
 12919 users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and  
 12920 bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Cleaning and furniture care products	Automotive care products (Brake cleaner)

12923  
 12924 **5.3.54 Consumer Use – Cleaning and furniture care products – Automotive care products (Parts**  
 12925 **cleaner)**

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12926  
 12927 Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in cleaning and furniture  
 12928 care products – automotive care products (parts cleaner):

- 12929 • **Presents an unreasonable risk of injury to health (consumers and bystanders).**

12930  
 12931 Unreasonable risk driver – consumers:

- 12932 • Neurotoxicity resulting from acute inhalation and dermal exposures.

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Unreasonable risk driver – bystanders:

- Neurotoxicity resulting from acute inhalation.

Driver benchmarks – consumers and bystanders:

- Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity:
  - Acute inhalation MOE 0.6 (moderate intensity user). (Table 4-90)
  - Acute dermal MOE 1.3E-02 (moderate intensity user). (Table 4-91)

Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 3.3 (moderate intensity user). (Table 4-90)

Risk Considerations: All pathways of consumer and bystander exposure for this condition of use indicate risk. Consumer and bystander risk determinations reflect the effects associated with acute exposures. Risk estimates for consumer users at the medium intensity use scenarios of acute inhalation and dermal exposures indicate risk. For bystanders, the risk estimates for the medium intensity use scenario of acute inhalation indicate risk. Because bystanders are not expected to be dermally exposed to PCE, dermal risks to bystanders were not evaluated. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Cleaning and furniture care products	Automotive care products (Parts cleaner)

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**5.3.55 Consumer Use – Cleaning and furniture care products – Aerosol cleaner (Vandalism Mark & Stain Remover, Mold Cleaner, Weld Splatter Protectant)**

Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in cleaning and furniture care products – aerosol cleaner (vandalism mark & stain remover, mold cleaner, weld splatter protectant):

- **Presents an unreasonable risk of injury to health (consumers and bystanders).**

Unreasonable risk driver – consumers:

- Neurotoxicity resulting from acute inhalation.

Unreasonable risk driver – bystanders:

- Neurotoxicity resulting from acute inhalation.

Driver benchmarks – consumers and bystanders:

- Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity: Acute inhalation MOE 0.3 (moderate intensity user). (Table 4-92)

Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 1.6 (moderate intensity user). (Table 4-92)

Risk Considerations: Risk estimates for consumer users and bystanders indicate risk from acute inhalation exposures. Consumer and bystander risk determinations reflect the effects associated with acute exposures. Dermal exposures were not quantified for this scenario, as consumer dermal exposure with impeded evaporation is not expected, and bystanders are not expected to be dermally exposed to PCE. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Cleaning and furniture care products	Aerosol cleaner (Vandalism Mark & Stain Remover, Mold Cleaner, Weld Splatter Protectant)

**5.3.56 Consumer Use – Cleaning and furniture care products – Non-aerosol cleaner (e.g., marble and stone polish)**

Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in cleaning and furniture care products – non-aerosol cleaner (e.g., marble and stone polish):

- **Presents an unreasonable risk of injury to health (consumers and bystanders).**

Unreasonable risk driver – consumers:

- Neurotoxicity resulting from acute inhalation.

Unreasonable risk driver – bystanders:

- Neurotoxicity resulting from acute inhalation.

Driver benchmarks – consumers and bystanders:

- Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity:
  - Acute inhalation MOE 6.8E-02 (moderate intensity user). (Table 4-93)
  - Acute dermal MOE 5.4E-02 (moderate intensity user). (Table 4-94)

Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 0.4 (moderate intensity user). (Table 4-93)

Risk Considerations: All pathways of consumer and bystander exposure for this condition of use indicate risk. Consumer and bystander risk determinations reflect the effects associated with acute exposures. Risk estimates for consumer users at the medium intensity use scenarios of acute inhalation and dermal exposures indicate risk. For bystanders, the risk estimates for the medium intensity use scenario of acute inhalation indicate risk. Because bystanders are not expected to be dermally exposed to PCE, dermal risks to bystanders were not evaluated. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Cleaning and furniture care products	Non-aerosol cleaner (e.g., marble and stone polish)

**5.3.57 Consumer Use – Lubricants and greases – Lubricants and greases (cutting fluid)**

Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in lubricants and greases – lubricants and greases (cutting fluid):

- **Presents an unreasonable risk of injury to health (consumers and bystanders).**

Unreasonable risk driver – consumers:

- Neurotoxicity resulting from acute inhalation.

Unreasonable risk driver – bystanders:

- Neurotoxicity resulting from acute inhalation.

Driver benchmarks – consumers and bystanders:

- Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity: Acute inhalation MOE 1.3 (moderate intensity user). (Table 4-95)

Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 6.7 (moderate intensity user). (Table 4-95)

Risk Considerations: Risk estimates for consumer users and bystanders at the medium intensity use scenarios of acute inhalation exposures indicate risk. Consumer and bystander risk determinations reflect the effects associated with acute exposures. Dermal exposures were not quantified for this scenario, as consumer dermal exposure with impeded evaporation is not expected, and bystanders are not expected to be dermally exposed to PCE. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to

users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Cleaning and furniture care products	Lubricants and greases (cutting fluid)

**5.3.58 Consumer Use – Lubricants and greases – Lubricants and greases (Lubricants and Penetrating Oils)**

Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in lubricants and greases – lubricants and greases (lubricants and penetrating oils):

- **Presents an unreasonable risk of injury to health (consumers and bystanders).**

Unreasonable risk driver – consumers:

- Neurotoxicity resulting from acute inhalation.

Unreasonable risk driver – bystanders:

- Neurotoxicity resulting from acute inhalation.

Driver benchmarks – consumers and bystanders:

- Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity: Acute inhalation MOE 1.4 (moderate intensity user). (Table 4-96)

Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 7.3 (moderate intensity user). (Table 4-96)

Risk Considerations: Risk estimates for consumer users and bystanders at the medium intensity use scenarios of acute inhalation exposures indicate risk. Consumer and bystander risk determinations reflect the effects associated with acute exposures. Dermal exposures were not quantified for this scenario, as consumer dermal exposure with impeded evaporation is not expected, and bystanders are not expected to be dermally exposed to PCE. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Cleaning and furniture care products	Lubricants and greases (lubricants and penetrating oils)

13094  
 13095 **5.3.59 Consumer Use – Adhesives and sealant chemicals – Adhesives for arts and crafts**  
 13096 **(includes industrial adhesive, arts and crafts adhesive, gun ammunition sealant)**

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13097  
 13098 Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in adhesives and sealant  
 13099 chemicals – adhesives for arts and crafts (includes industrial adhesive, arts and crafts adhesive, gun  
 13100 ammunition sealant):

- 13101 • **Presents an unreasonable risk of injury to health (consumers).**
- 13102 • Does not present an unreasonable risk of injury to health (bystanders).

13103  
 13104 Unreasonable risk driver – consumers:

- 13105 • Neurotoxicity resulting from acute inhalation.

13106  
 13107 Driver benchmarks – consumers:

- 13108 • Neurotoxicity: Benchmark MOE = 10.

13109  
 13110 Risk estimate – consumers:

- 13111 • Neurotoxicity: Acute inhalation MOE 2.3 (moderate intensity user). (Table 4-97)

13112  
 13113 Risk Considerations: Risk estimates for consumer users at the medium intensity use scenarios of acute  
 13114 inhalation exposures indicate risk. EPA did not find risk to bystanders. Consumer risk determinations  
 13115 reflect the effects associated with acute exposures. Dermal exposures were not quantified for this  
 13116 scenario, as consumer dermal exposure with impeded evaporation is not expected, and bystanders are  
 13117 not expected to be dermally exposed to PCE. For the consumer exposure scenario for bystanders,  
 13118 inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to  
 13119 users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and  
 13120 bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Adhesive and sealant chemicals	Adhesives for arts and crafts (includes industrial adhesive, arts and crafts adhesive, gun ammunition sealant)

13123  
 13124 **5.3.60 Consumer Use – Adhesives and sealant chemicals – Adhesives for arts and crafts**  
 13125 **(Livestock Grooming Adhesive)**

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13126  
 13127 Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in adhesives and sealant  
 13128 chemicals – adhesives for arts and crafts (livestock grooming adhesive):

- 13129 • Does not present an unreasonable risk of injury to health (consumers and bystanders).

13130  
 13131 Benchmarks – consumers and bystanders:

- 13132 • Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity: Acute inhalation MOE 12 (moderate intensity user). (Table 4-98)

Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 64(moderate intensity user). (Table 4-98)

Risk Considerations: Risk estimates for consumer users and bystanders at the medium intensity use scenarios of acute inhalation exposures do not indicate risk. Dermal exposures were not quantified for this scenario, as consumer dermal exposure with impeded evaporation is not expected, and bystanders are not expected to be dermally exposed to PCE. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Adhesive and sealant chemicals	Adhesives for arts and crafts (Livestock grooming adhesive)

**5.3.61 Consumer Use – Adhesives and sealant chemicals – Adhesives for arts and crafts (Column Adhesive, Caulk and Sealant)**

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Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in adhesives and sealant chemicals – adhesives for arts and crafts (column adhesive, caulk and sealant):

- **Presents an unreasonable risk of injury to health (consumers).**
- Does not present an unreasonable risk of injury to health (bystanders).

Unreasonable risk driver – consumers:

- Neurotoxicity resulting from acute inhalation.

Driver benchmarks – consumers:

- Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity: Acute inhalation MOE 2.3 (moderate intensity user). (Table 4-99)

Risk Considerations: Risk estimates for consumer users at the medium intensity use scenarios of acute inhalation exposures indicate risk. Consumer risk determinations reflect the effects associated with acute exposures. Acute inhalation exposure for bystanders was not evaluated, as the consumer area of use was assumed to be similar conditions as outside the home. Dermal exposures were not quantified for this scenario, as consumer dermal exposure with impeded evaporation is not expected, and bystanders are not expected to be dermally exposed to PCE.

Life Cycle Stage	Category	Subcategory
Consumer use	Adhesive and sealant chemicals	Light Repair Adhesives - Adhesives for arts and crafts (Column Adhesive, Caulk and Sealant)

**5.3.62 Consumer Use – Paints and coatings – Solvent-based paints and coatings (Outdoor water shield (liquid))**

Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in paints and coatings – solvent-based paints and coatings (outdoor water shield (liquid)):

- **Presents an unreasonable risk of injury to health (consumers and bystanders).**

Unreasonable risk driver – consumers:

- Neurotoxicity resulting from acute inhalation and dermal exposures.

Unreasonable risk driver – bystanders:

- Neurotoxicity resulting from acute inhalation.

Driver benchmarks – consumers and bystanders:

- Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity:
  - Acute inhalation MOE 1.1 (moderate intensity user). (Table 4-100)
  - Acute dermal MOE 2.5E-02 (moderate intensity user) (Table 4-101)

Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 3.3 (moderate intensity user). (Table 4-100)

Risk Considerations: All pathways of consumer and bystander exposure for this condition of use indicate risk. Consumer and bystander risk determinations reflect the effects associated with acute exposures. Risk estimates for consumer users at the medium intensity use scenarios of acute inhalation and dermal exposures indicate risk. For bystanders, the risk estimates for the medium intensity use scenario of acute inhalation indicate risk. Because bystanders are not expected to be dermally exposed to PCE, dermal risks to bystanders were not evaluated. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Paints and coatings	Solvent-based paints and coatings (Outdoor water shield (liquid))



13211  
 13212 **5.3.63 Consumer Use – Paints and coatings – Solvent-based paints and coatings (Coatings**  
 13213 **and primers (aerosol))**

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13214  
 13215 Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in paints and coatings –  
 13216 solvent-based paints and coatings (coatings and primers (aerosol)):

- Does not present an unreasonable risk of injury to health (consumers and bystanders).

13217  
 13218  
 13219 Unreasonable risk driver – consumers and bystanders:

- Neurotoxicity resulting from acute inhalation.

13220  
 13221  
 13222 Driver benchmarks – consumers and bystanders:

- Neurotoxicity: Benchmark MOE = 10.

13223  
 13224  
 13225 Risk estimate – consumers:

- Neurotoxicity: Acute inhalation MOE 62 (moderate intensity user). (Table 4-102)

13226  
 13227  
 13228 Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 2143 (moderate intensity user). (Table 4-102)

13229  
 13230  
 13231 Risk Considerations: Risk estimates for consumer users and bystanders at the medium intensity use  
 13232 scenarios of acute inhalation exposures do not indicate risk. Dermal exposures were not quantified for  
 13233 this scenario, as consumer dermal exposure with impeded evaporation is not expected, and bystanders  
 13234 are not expected to be dermally exposed to PCE. For the consumer exposure scenario for bystanders,  
 13235 inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to  
 13236 users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and  
 13237 bystander(s) would be exposed to following an exposure event.  
 13238  
 13239

Life Cycle Stage	Category	Subcategory
Consumer use	Paints and coatings	Solvent-based paints and coatings (Coatings and primers (aerosol))

13240  
 13241 **5.3.64 Consumer Use – Paints and coatings – Solvent-based paints and coatings (Rust**  
 13242 **Primer and Sealant (liquid))**

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13243  
 13244 Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in paints and coatings –  
 13245 solvent-based paints and coatings (rust primer and sealant (liquid)):

- **Presents an unreasonable risk of injury to health (consumers).**
- Does not present an unreasonable risk of injury to health (bystanders).

13246  
 13247  
 13248  
 13249 Unreasonable risk driver – consumers:

- Neurotoxicity resulting from dermal exposures.

13252 Driver benchmarks – consumers:

- 13253 • Neurotoxicity: Benchmark MOE = 10.

13254  
13255 Risk estimate – consumers:

- 13256 • Acute dermal MOE 1.8E-02 (moderate intensity user) (Table 4-104)

13257  
13258  
13259 Risk Considerations: Risk estimates for consumer users at the medium intensity use scenarios of dermal  
13260 exposures indicate risk. EPA did not find risk to bystanders. Consumer risk determinations reflect the  
13261 effects associated with dermal exposures. Because bystanders are not expected to be dermally exposed  
13262 to PCE, dermal risks to bystanders were not evaluated. For the consumer exposure scenario for  
13263 bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate  
13264 exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a  
13265 user and bystander(s) would be exposed to following an exposure event.  
13266  
13267

Life Cycle Stage	Category	Subcategory
Consumer use	Paints and coatings	Solvent-based paints and coatings (Rust Primer and Sealant (liquid))

13268  
13269 **5.3.65 Consumer Use – Paints and coatings – Solvent-based paints and coatings (Metallic**  
13270 **Overglaze)**

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13271  
13272 Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in paints and coatings –  
13273 solvent-based paints and coatings (metallic overglaze):

- 13274 • Does not present an unreasonable risk of injury to health (consumers and bystanders).

13275  
13276 Benchmarks – consumers and bystanders:

- 13277 • Neurotoxicity: Benchmark MOE = 10.

13278  
13279 Risk estimate – consumers:

- 13280 • Neurotoxicity: Acute inhalation MOE 337 (moderate intensity user). (Table 4-105)

13281  
13282 Risk estimate – bystanders:

- 13283 • Neurotoxicity: Acute inhalation MOE 1674 (moderate intensity user). (Table 4-105)

13284  
13285 Risk Considerations: Risk estimates for consumer users and bystanders at the medium intensity use  
13286 scenarios of acute inhalation exposures do not indicate risk. Dermal exposures were not quantified for  
13287 this scenario, as consumer dermal exposure with impeded evaporation is not expected, and bystanders  
13288 are not expected to be dermally exposed to PCE. For the consumer exposure scenario for bystanders,  
13289 inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to  
13290 users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and  
13291 bystander(s) would be exposed to following an exposure event.  
13292

13293

Life Cycle Stage	Category	Subcategory
Consumer use	Paints and coatings	Solvent-based paints and coatings (Metallic Overglaze)

13294

**5.3.66 Consumer Use – Other Uses – Metal (e.g., stainless steel) and stone polishes**

13295

13296

13297 Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in other uses – metal (e.g.,  
 13298 stainless steel) and stone polishes:

13299

- **Presents an unreasonable risk of injury to health (consumers and bystanders).**

13300

13301

Unreasonable risk driver – consumers:

13302

- Neurotoxicity resulting from acute inhalation and dermal exposures.

13303

13304

Unreasonable risk driver – bystanders:

13305

- Neurotoxicity resulting from acute inhalation.

13306

13307

Driver benchmarks – consumers and bystanders:

13308

- Neurotoxicity: Benchmark MOE = 10.

13309

13310

Risk estimate – consumers:

13311

- Neurotoxicity:
  - Acute inhalation MOE 0.2 (moderate intensity user). (Table 4-106)
  - Acute dermal MOE 0.1 (moderate intensity user) (Table 4-107)

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Risk estimate – bystanders:

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- Neurotoxicity: Acute inhalation MOE 0.8 (moderate intensity user). (Table 4-106)

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Risk Considerations: All pathways of consumer and bystander exposure for this condition of use indicate risk. Consumer and bystander risk determinations reflect the effects associated with acute exposures. Risk estimates for consumer users at the medium intensity use scenarios of acute inhalation and dermal exposures indicate risk. For bystanders, the risk estimates for the medium intensity use scenario of acute inhalation indicate risk. Because bystanders are not expected to be dermally exposed to PCE, dermal risks to bystanders were not evaluated. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

13329

Life Cycle Stage	Category	Subcategory
Consumer use	Other Uses	Metal (e.g., stainless steel) and stone polishes

**5.3.67 Consumer Use – Other Uses – Inks and ink removal products; welding; mold cleaning, release and protectant products**

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Section 6(b)(4)(A) unreasonable risk determination for consumer use of PCE in other uses – inks and ink removal products; welding; mold cleaning, release and protectant products:

- **Presents an unreasonable risk of injury to health (consumers and bystanders).**

Unreasonable risk driver – consumers:

- Neurotoxicity resulting from acute inhalation.

Unreasonable risk driver – bystanders:

- Neurotoxicity resulting from acute inhalation.

Driver benchmarks – consumers and bystanders:

- Neurotoxicity: Benchmark MOE = 10.

Risk estimate – consumers:

- Neurotoxicity: Acute inhalation MOE 0.3 (moderate intensity user). (Table 4-92)

Risk estimate – bystanders:

- Neurotoxicity: Acute inhalation MOE 1.6 (moderate intensity user). (Table 4-92)

Risk Considerations: Risk estimates for consumer users and bystanders indicate risk from acute inhalation exposures. Consumer and bystander risk determinations reflect the effects associated with acute exposures. Dermal exposures were not quantified for this scenario, as consumer dermal exposure with impeded evaporation is not expected, and bystanders are not expected to be dermally exposed to PCE. For the consumer exposure scenario for bystanders, inhalation exposures were estimated using the same model (CEM 2.1) used to estimate exposure to users. CEM 2.1 is a two-zone model that allows for the estimation of air concentrations a user and bystander(s) would be exposed to following an exposure event.

Life Cycle Stage	Category	Subcategory
Consumer use	Other Uses	<ul style="list-style-type: none"> <li>• Inks and ink removal products</li> <li>• Welding</li> <li>• Mold cleaning, release and protectant products</li> </ul>

**5.3.68 Disposal**

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Section 6(b)(4)(A) unreasonable risk determination for the disposal of PCE:

- **Presents an unreasonable risk of injury to health (workers).**
- **Presents an unreasonable risk to the environment (aquatic organisms).**
- Does not present an unreasonable risk of injury to health (occupational non-users).

13369 Unreasonable risk driver – workers and aquatic organisms:

- 13370 • Neurotoxicity resulting from chronic dermal exposures.
- 13371 • Cancer resulting from chronic dermal exposures.
- 13372 • Growth effects to aquatic invertebrates from chronic exposure.
- 13373 • Algae mortality from exposure.

13374  
13375 Driver benchmarks – workers and aquatic organisms:

- 13376 • Neurotoxicity: Chronic non-cancer benchmark MOE = 100.
- 13377 • Cancer (liver tumors): Benchmark =  $1 \times 10^{-4}$ .
- 13378 • Mortality: Algae RQ  $\geq 1$ .

13379  
13380 Risk estimate - workers:

- 13381 • Neurotoxicity:
  - 13382 ○ Chronic dermal MOEs 154 and 51 (central tendency and high-end) with PPE (gloves PF
  - 13383 = 20). (Table 4-69)
- 13384 • Cancer (liver tumors):
  - 13385 ○ Dermal: 3.2E-05 and 1.2E-04 (central tendency and high-end) with PPE (gloves PF =
  - 13386 20). (Table 4-70)

13387  
13388 Risk estimate for facilities with exceedances – aquatic organisms: (Table 4-110)

- 13389 • Algae mortality from exposure: (some facilities had exceedances for multiple scenarios)
  - 13390 ○ RQ = 6.4 (algae, 172 days of exceedance, indirect release).
  - 13391 ○ RQ = 80 (algae, 20 days of exceedance, indirect release).
  - 13392 ○ RQ = 25 (algae, 235 days of exceedance, indirect release).
  - 13393 ○ RQ = 311 (algae, 20 days of exceedance, indirect release).
  - 13394 ○ RQ = 2.2 (algae, 90 days of exceedance, indirect release).

13395  
13396 Risk Considerations: For workers, while non-cancer and cancer risk estimates for inhalation exposures  
13397 do not indicate risks with assumed respiratory protection (APF 25), dermal chronic non-cancer and  
13398 dermal cancer risk estimates (high-end) indicate risk even with assumed dermal protection (PF 20). Risk  
13399 estimates for ONUs for acute and chronic inhalation exposures do not indicate risk at the central  
13400 tendency. EPA did not separately calculate risk estimates for ONUs and workers. There is uncertainty in  
13401 the ONU risk estimate since the data did not distinguish between worker and ONU inhalation exposure  
13402 estimates. ONU inhalation exposures are expected to be lower than inhalation exposures for workers  
13403 directly handling the chemical substance; however, the relative exposure of ONUs to workers in these  
13404 cases cannot be quantified. To account for this uncertainty, EPA considered the central tendency  
13405 estimate when determining ONU risk.

13406  
13407 Environmental releases for this condition of use indicate chronic risk to aquatic organisms and risk to  
13408 algae. Of the 13 facilities assessed for the waste handling, disposal, treatment, and recycling of PCE,  
13409 three facilities had releases indicating risk to aquatic organisms (RQs  $\geq 1$  and 20 days of exceedance for  
13410 algae). RQ values ranged from 2.2 (90 days of exceedance, indirect discharge) to 311 (20 days of  
13411 exceedance, indirect discharge). Industrial wastewater or liquid wastes may be treated on-site and then  
13412 released to surface water (direct discharge) or pre-treated and released to POTW (indirect discharge).  
13413 EPA estimated 80% removal of PCE from indirect discharging facilities and 0% removal for direct  
13414 releases to surface water. Exceedances occurred using indirect release scenarios. An exceedance from  
13415 indirect release indicates that risk can exist even with waste water treatment if the rate of PCE release to

13416 surface water is high. Four of the 13 facilities assessed as for the waste handling, disposal, treatment,  
 13417 and recycling of PCE did not have NPDES permits. EPA identified risk to algae from indirect release of  
 13418 PCE to surface water from one of the facilities without a NPDES permit. Lack of a NPDES permit  
 13419 increases the uncertainty in the surface water release estimate for a facility. Based on the surface water  
 13420 PCE concentration and COC confidence levels, the overall confidence in the risk estimate to aquatic  
 13421 organisms from exposure to PCE is medium.  
 13422

Life Cycle Stage	Category	Subcategory
Disposal	Disposal	<ul style="list-style-type: none"> <li>• Industrial pre-treatment</li> <li>• Industrial wastewater treatment</li> <li>• Publicly owned treatment works (POTW)</li> <li>• Underground injection</li> <li>• Municipal landfill</li> <li>• Hazardous landfill</li> <li>• Other land disposal</li> <li>• Municipal waste incinerator</li> <li>• Hazardous waste incinerator</li> <li>• Off-site waste transfer</li> </ul>

13423

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14555 Kidney Transcriptomic Effects of Trichloroethylene and Tetrachloroethylene in B6C3F1 Mouse.  
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- 14557  
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14559 **APPENDICES**

14560 **Appendix A REGULATORY HISTORY**

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14562 **A.1 Federal Laws and Regulations**

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14563 **Table Apx A-1. Federal Laws and Regulations**

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Statutes/Regulations	Description of Authority/Regulation	Description of Regulation
<b>EPA Regulations</b>		
Toxics Substances Control Act (TSCA) – Section 6(b)	EPA is directed to identify and begin risk evaluations on 10 chemical substances drawn from the 2014 update of the TSCA Work Plan for Chemical Assessments.	PCE is on the initial list of chemicals to be evaluated for unreasonable risk under TSCA (81 FR 91927, December 19, 2016).
Toxics Substances Control Act (TSCA) – Section 8(a)	The TSCA Section 8(a) Chemical Data Reporting (CDR) Rule requires manufacturers (including importers) to give EPA basic exposure-related information on the types, quantities and uses of chemical substances produced domestically and imported into the United States.	PCE manufacturing (including importing), processing, and use information is reported under the Chemical Data Reporting (CDR) rule (40 CFR 711).
Toxics Substances Control Act (TSCA) – Section 8(b)	EPA must compile, keep current, and publish a list (the TSCA Inventory) of each chemical substance manufactured, processed or imported in the United States.	PCE was on the initial TSCA Inventory and therefore was not subject to EPA’s new chemicals review process (60 FR 16309, March 29, 1995).
Toxics Substances Control Act (TSCA) – Section 8(e)	Manufacturers (including imports), processors, and distributors must immediately notify EPA if they obtain information that supports the conclusion that a chemical substance or mixture presents a substantial risk of injury to health or the environment.	Eleven risk reports received for PCE (1978-2010) (US EPA, ChemView. Accessed April 13, 2017).
Toxics Substances Control Act (TSCA) – Section 4	Provides EPA with authority to issue rules and orders requiring manufacturers (including importers) and processors to test chemical substances and mixtures.	Nine chemical data submissions from test rules received for PCE (1978-1980) (US EPA, ChemView. Accessed April 13, 2017).
Emergency Planning and Community Right-to-Know Act	Requires annual reporting from facilities in specific industry sectors that employ 10 or more full time	PCE is a listed substance subject to reporting requirements under 40 CFR 372.65 effective as of January 1, 1987.



Statutes/Regulations	Description of Authority/Regulation	Description of Regulation
(EPCRA) – Section 313	equivalent employees and that manufacture, process or otherwise use a TRI-listed chemical in quantities above threshold levels.	
Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) - Sections 3 and 6	FIFRA governs the sale, distribution and use of pesticides. Section 3 of FIFRA generally requires that pesticide products be registered by EPA prior to distribution or sale. Pesticides may only be registered if, among other things, they do not cause “unreasonable adverse effects on the environment.” Section 6 of FIFRA provides EPA with the authority to cancel pesticide registrations if either (1) the pesticide, labeling or other material does not comply with FIFRA; or (2) when used in accordance with widespread and commonly recognized practice, the pesticide generally causes unreasonable adverse effects on the environment.	EPA removed PCE and other chemical substances from its list of pesticide product inert ingredients used in pesticide products (63 FR 34384, June 24, 1998).
Clean Air Act (CAA) – Section 112(b)	Defines the original list of 189 hazardous air pollutants (HAP). Under 112(c) of the CAA, EPA must identify and list source categories that emit HAP and then set emission standards for those listed source categories under CAA section 112(d). CAA section 112(b)(3)(A) specifies that any person may petition the Administrator to modify the list of HAP by adding or deleting a substance. Since 1990 EPA has removed two pollutants from the original list leaving 187 at present.	Lists PCE as a Hazardous Air Pollutant (42 U.S. Code § 7412), and is considered an “urban air toxic” (CAA Section 112(k)).
Clean Air Act (CAA) – Section 112(d)	Section 112(d) states that the EPA must establish national emission standards for HAP (NESHAP) for each category or subcategory of major sources and area sources of HAPs [listed pursuant to Section 112(c)]. The standards must require the maximum degree of emission reduction that the EPA determines to be achievable by each	There are a number of source-specific CAA, Section 112, NESHAPs for PCE, including: Dry cleaners (73 FR 39871, July 11, 2008) Organic liquids distribution (non-gasoline) (69 FR 5038, February 3, 2004)

Statutes/Regulations	Description of Authority/Regulation	Description of Regulation
	<p>particular source category. Different criteria for maximum achievable control technology (MACT) apply for new and existing sources. Less stringent standards, known as generally available control technology (GACT) standards, are allowed at the Administrator's discretion for area sources.</p>	<p>Off-site waste and recovery operations (64 FR 38950, July 20, 1999)                      Rubber Tire Manufacturing (67 FR 45588, July 9, 2002)                      Wood furniture manufacturing (60 FR 62930, December 7, 1995)                      Synthetic organic chemical manufacturing (59 FR 19402, April 22, 1994)                      Chemical Manufacturing Area Source Categories (74 FR 56008, October 29, 2009)                      Publicly Owned Treatment Works (64 FR 57572, October 26, 1999)                      Site Remediation includes PCE (68 FR 58172, October 8, 2003)</p>
<p>Clean Air Act (CAA)                      – Section 112(d) and 112(f)</p>	<p>Risk and technology review (RTR) of section 112(d) MACT standards. Section 112(f)(2) requires EPA to conduct risk assessments for each source category subject to section 112(d) MACT standards, and to determine if additional standards are needed to reduce remaining risks. Section 112(d)(6) requires EPA to review and revise the MACT standards, as necessary, taking into account developments in practices, processes and control technologies.”</p>	<p>EPA has promulgated a number of RTR NESHAP (e.g., the RTR NESHAP for PCE Dry Cleaning (71 FR 42724; July 27, 2006) and the RTR NESHAP for Halogenated Solvent Cleaning (72 FR 25138; May 3, 2007) and will do so, as required, for the remaining source categories with NESHAP</p>
<p>Clean Air Act (CAA)                      – Section 183(e)</p>	<p>Section 183(e) requires EPA to list the categories of consumer and commercial products that account for at least 80 percent of all VOC emissions in areas that violate the National Ambient Air Quality Standards (NAAQS) for ozone and to issue standards for these categories that require “best available controls.” In lieu of regulations, EPA may issue control techniques guidelines if the guidelines are determined to be substantially as effective as regulations.</p>	<p>PCE is listed under the National Volatile Organic Compound Emission Standards for Aerosol Coatings (40 CFR part 59, subpart E). PCE has a reactivity factor of 0.04g O3/g VOC.</p>
<p>Clean Air Act (CAA)                      – Section 612</p>	<p>Under Section 612 of the Clean Air Act (CAA), EPA’s Significant New Alternatives Policy (SNAP) program</p>	<p>Under the SNAP program, EPA listed PCE as an acceptable substitute in cleaning solvent for metal cleaning,</p>

Statutes/Regulations	Description of Authority/Regulation	Description of Regulation
	reviews substitutes for ozone depleting substances within a comparative risk framework. EPA publishes lists of acceptable and unacceptable alternatives. A determination that an alternative is unacceptable or acceptable only with conditions, is made through rulemaking.	electronics cleaning and precision cleaning (59 FR 13044, March 18, 1994). PCE is cited as an alternative to methyl chloroform and CFC-113 for metals, electronics and precision cleaning. PCE was also noted to have no ozone depletion potential and cited as a VOC-exempt solvent and acceptable ozone-depleting substance substitute (72 FR 30142, May 30, 2007).
Clean Water Act (CWA) – Section 301(b), 304(b), 306, and 307(b)	Requires establishment of Effluent Limitations Guidelines and Standards for conventional, toxic, and non-conventional pollutants. For toxic and non-conventional pollutants, EPA identifies the best available technology that is economically achievable for that industry after considering statutorily prescribed factors and sets regulatory requirements based on the performance of that technology.	PCE is designated as a toxic pollutant under section 307(a)(1) of CWA and as such is subject to effluent limitations. Also under section 304, PCE is included in the list of total toxic organics (TTO) (40 CFR 413.02(i)).
Clean Water Act (CWA) 304(a)	Section 304(a)(1) of the Clean Water Act (CWA) requires EPA to develop and publish, and from time to time revise, recommended criteria for the protection of water quality that accurately reflect the latest scientific knowledge. Water quality criteria developed under section 304(a) are based solely on data and scientific judgments on the relationship between pollutant concentrations and environmental and human health effects.	
Clean Water Act (CWA) – Section 307(a)	Establishes a list of toxic pollutants or combination of pollutants under the CWA. The statute specifies a list of families of toxic pollutants also listed in the Code of Federal Regulations at 40 CFR 401.15. The “priority pollutants” specified by those families are listed in 40 CFR part 423, Appendix A. These are pollutants for which best available	

Statutes/Regulations	Description of Authority/Regulation	Description of Regulation
	<p>technology effluent limitations must be established on either a national basis through rules (Sections 301(b), 304(b), 307(b), 306), or on a case-by-case best professional judgement basis in NPDES permits (Section 402(a)(1)(B)).</p>	
<p>Safe Drinking Water Act (SDWA) – Section 1412</p>	<p>Requires EPA to publish a non-enforceable maximum contaminant level goals (MCLGs) for contaminants which 1. may have an adverse effect on the health of persons; 2. are known to occur or there is a substantial likelihood that the contaminant will occur in public water systems with a frequency and at levels of public health concern; and 3. in the sole judgment of the Administrator, regulation of the contaminant presents a meaningful opportunity for health risk reductions for persons served by public water systems. When EPA publishes an MCLG, EPA must also promulgate a National Primary Drinking Water Regulation (NPDWR) which includes either an enforceable maximum contaminant level (MCL) or a required treatment technique. Public water systems are required to comply with NPDWRs</p>	<p>PCE is subject to National Primary Drinking Water Regulations (NPDWR) under SDWA with a MCLG of zero and an enforceable maximum contaminant level (MCL) of 0.005 mg/L (40 CFR 141.61). On January 11, 2017, EPA announced a review of the eight existing NPDWRs (82 FR 3518). PCE is one of the eight NPDWRs. EPA requested comment on the eight NPDWRs identified as candidates for revision.</p>
<p>Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) – Section 102(a) and 103</p>	<p>Authorizes EPA to promulgate regulations designating as hazardous substances those substances which, when released into the environment, may present substantial danger to the public health or welfare or the environment. EPA must also promulgate regulations establishing the quantity of any hazardous substance the release of which must be reported under Section 103.</p> <p>Section 103 requires persons in charge of vessels or facilities to report to the National Response Center if they have</p>	<p>PCE is a hazardous substance under CERCLA. Releases of PCE in excess of 100 pounds must be reported (40 CFR 302.4).</p>

Statutes/Regulations	Description of Authority/Regulation	Description of Regulation
	knowledge of a release of a hazardous substance above the reportable quantity threshold.	
Resource Conservation and Recovery Act (RCRA) – Section 3001	Directs EPA to develop and promulgate criteria for governing hazardous waste identification, classification, generation, management and disposal.	<p>RCRA Subtitle C, Section 3001 identifies PCE as a characteristic and listed hazardous waste. RCRA Hazardous Waste Code: D039 (Toxicity); F001, F002; U210.</p> <p>In 2013, EPA modified its hazardous waste management regulations to conditionally exclude solvent-contaminated wipes that have been cleaned and reused from the definition of solid waste under RCRA (78 FR 46447, July 31, 2013).</p>
Superfund Amendments and Reauthorization Act (SARA) –	Requires the Agency to revise the hazardous ranking system and update the National Priorities List of hazardous waste sites, increases state and citizen involvement in the superfund program and provides new enforcement authorities and settlement tools.	PCE is listed on SARA, an amendment to CERCLA and the CERCLA Priority List of Hazardous Substances. This list includes substances most commonly found at facilities on the CERCLA National Priorities List (NPL) that have been deemed to pose the greatest threat to public health.
<b>Other Federal Regulations</b>		
Federal Hazardous Substance Act (FHSA)	Allows the Consumer Product Safety Commission (CPSC) to (1) require precautionary labeling on the immediate container of hazardous household products or (2) to ban certain products that are so dangerous or the nature of the hazard is such that required labeling is not adequate to protect consumers.	Under the Federal Hazardous Substance Act, section 1500.83(a)(31), visual novelty devices containing PCE are regulated by CPSC.
Federal Food, Drug, and Cosmetic Act (FFDCA)	Provides the U.S. FDA (Food and Drug Administration) with authority to oversee the safety of food, drugs and cosmetics.	The FDA regulates PCE in bottled water. The maximum permissible level of PCE in bottled water is 0.005 mg/L (21 CFR 165.110).

Statutes/Regulations	Description of Authority/Regulation	Description of Regulation
Occupational Safety and Health Act (OSH Act)	Requires employers to provide their workers with a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress or unsanitary conditions. Under the Act, the Occupational Safety and Health Administration can issue occupational safety and health standards including such provisions as Permissible Exposure Limits (PELs), exposure monitoring, engineering and administrative control measures and respiratory protection.	In 1970, OSHA issued occupational safety and health standards for PCE that included a Permissible Exposure Limit (PEL) of 100 ppm 8 hr. TWA, with a ceiling level of 200 ppm for 5 minutes in any 3 hr. period with a maximum peak of 300 ppm (29 CFR 1910.1000).
Atomic Energy Act Department of Energy (DOE)	The Atomic Energy Act authorizes DOE to regulate the health and safety of its contractor employees	10 CFR 851.23, Worker Safety and Health Program, requires the use of the 2005 ACGIH® TLV®s if they are more protective than the OSHA PEL. The 2005 TLV® for PCE is 25 ppm (8hr Time Weighted Average) and 100 ppm Short Term Exposure Limit(STEL).

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## A.2 State Laws and Regulations

**Table\_Apx A-2. State Laws and Regulations**

State Actions	Description of Action
<b>State actions</b>	
State Permissible Exposure Limits	California has a workplace PEL of 25 ppm (California, OEHHA, 1988)
State Right-to-Know Acts	Massachusetts (454 CMR 21.00), New Jersey (42 N.J.R 1709(a)), Pennsylvania (Chapter 323, Hazardous Substance List), Rhode Island (RI Gen. Laws Sec. 28-21-1 et seq).
Volatile Organic Compound (VOC) Regulations for Consumer Products	Many states regulate PCE as a VOC. These regulations may set VOC limits for consumer products and/or ban the sale of certain consumer products as an ingredient and/or impurity. Regulated products vary from state to state, and could include contact and aerosol adhesives, aerosols, electronic cleaners, footwear or leather care products, and general degreasers, among other products. California (Title 17, California Code of Regulations, Division 3, Chapter 1, Subchapter 8.5, Articles 1, 2, 3 and 4), Connecticut (R.C.S.A Sections 22a-174-40, 22a-174-41, and 22a-174-44),

State Actions	Description of Action
	Delaware (Adm. Code Title 7, 1141), District of Columbia (Rules 20-720, 20-721, 20-735, 20-736, 20737), Illinois (35 Adm Code 223), Indiana ( 326 IAC 8-15), Maine (Chapter 152 of the Maine Department of Environmental Protection Regulations), Maryland (COMAR 26.11.32.00 to 26.11.32.26), Michigan (R 336.1660 and R 336. 1661), New Hampshire (Env--A 4100) New Jersey (Title 7, Chapter 27, Subchapter 24), New York (6 CRR-NY III A 235), Rhode Island (Air Pollution Control Regulation No. 31), and Virginia (9VAC5 CHAPTER 45) all have VOC regulations or limits for consumer products. Some of these states also require emissions reporting.
Other	There are several state level NESHAPs for dry cleaning and restrictions or phase outs of PCE (e.g. California, Maine, Massachusetts). Numerous states list PCE on a list of chemical substances of high concern to children (e.g. Oregon, Vermont, Washington). Under the California Proposition 65 list (California OEHHA), PCE is known to the state of California to cause cancer.

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### A.3 International Laws and Regulations

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**Table\_Apx A-3. Regulatory Actions by Other Governments and Tribes**

Country/Organization	Requirements and Restrictions
Canada	PCE is on the Canadian List of Toxic Substances (CEPA 1999 Schedule 1). The use and sale of PCE in the dry cleaning industry is regulated under <i>Use in Dry Cleaning and Reporting Requirements Regulations (Canada Gazette, Part II on March 12, 2003</i> . PCE is also regulated for use and sale for solvent degreasing under Solvent Degreasing Regulations (SOR/2003-283) (Canada Gazette, Part II on August 13, 2003). The purpose of the regulation is to reduce releases of PCE into the environment from solvent degreasing facilities using more than 1,000 kilograms of PCE per year. The regulation includes a market intervention by establishing tradable allowances for the use of PCE in solvent degreasing operations that exceed the 1,000 kilograms threshold per year.
European Union	PCE was evaluated under the 2013 Community Rolling Action Plan (CoRAP). The conclusion was no additional regulatory action was required (European Chemicals Agency (ECHA) database. Accessed April, 18 2017).
Australia	In 2011, a preliminary assessment of PCE was conducted (National Industrial Chemicals Notification and Assessment Scheme, NICNAS, 2016, Tetrachloroethylene. Accessed April, 18 2017).
Japan	PCE is regulated in Japan under the following legislation: <ul style="list-style-type: none"> <li>• Act on the Evaluation of Chemical Substances and Regulation of Their Manufacture, etc. (Chemical Substances Control Law; CSCL)</li> <li>• Act on Confirmation, etc. of Release Amounts of Specific Chemical Substances in the Environment and Promotion of Improvements to the Management Thereof</li> </ul>

Country/Organization	Requirements and Restrictions
	<ul style="list-style-type: none"> <li>• Industrial Safety and Health Act (ISHA)</li> <li>• Air Pollution Control Law</li> <li>• Water Pollution Control Law</li> <li>• Soil Contamination Countermeasures Act</li> <li>• Law for the Control of Household Products Containing Harmful Substances</li> </ul> <p>(National Institute of Technology and Evaluation (NITE) Chemical Risk Information Platform (CHIRP). Accessed April 18, 2017)</p>
<p>Australia, Austria, Belgium, Canada, Denmark, European Union, Finland, France, Germany, Hungary, Ireland, Israel, Japan, Latvia, New Zealand, People’s Republic of China, Poland, Singapore, South Korea, Spain, Sweden, Switzerland, United Kingdom</p>	<p>Occupational exposure limits for PCE (GESTIS International limit values for chemical agents (Occupational exposure limits, OELs) database. Accessed April 18, 2017).</p>
<p>Basel Convention</p>	<p>Halogenated organic solvents (Y41) are listed as a category of waste under the Basel Convention – Annex I. Although the United States is not currently a party to the Basel Convention, this treaty still affects U.S. importers and exporters.</p>
<p>OECD Control of Transboundary Movements of Wastes Destined for Recovery Operations</p>	<p>Halogenated organic solvents (A3150) are listed as a category of waste subject to The Amber Control Procedure under Council Decision C (2001) 107/Final.</p>

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## **Appendix B LIST OF SUPPLEMENTAL DOCUMENTS**

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1. Draft Risk Evaluation for Perchloroethylene ([U.S. EPA 2020a](#))
2. Draft Charge to the Panel for Perchloroethylene
3. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Extraction Tables for Environmental Fate and Transport Studies
4. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Quality Evaluation of Environmental Fate and Transport Studies
5. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Quality Evaluation of Physical Chemical Properties
6. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Quality Evaluation of Environmental Releases and Occupational Exposure Data Common Sources
7. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Quality Evaluation of Environmental Releases and Occupational Exposure
8. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Quality Evaluation for Consumer and Environmental Exposure
9. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Extraction for Consumer and Environmental Exposure
10. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Quality Evaluation of Ecological Hazard Studies
11. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Extraction Tables for Environmental Hazard Studies
12. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Updates to the Data Quality Criteria for Epidemiological Studies
13. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Quality Evaluation of Human Health Hazard Studies – Epidemiological Studies
14. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Extraction for Human Health Hazard Studies
15. Draft Risk Evaluation for Perchloroethylene, Systematic Review Supplemental File: Data Quality Evaluation of Human Health Hazard Studies – Animal Studies
16. Draft Risk Evaluation for Perchloroethylene Assessment of Occupational Exposure and Environmental Releases for Perchloroethylene
17. Draft Risk Evaluation for Perchloroethylene Occupational Risk Calculations
18. Draft Risk Evaluation for Perchloroethylene Consumer Inhalation Risk Calculations
19. Draft Risk Evaluation for Perchloroethylene Consumer Dermal Risk Calculations
20. Draft Risk Evaluation for Perchloroethylene Supplemental Information on Consumer Exposure

21. Draft Risk Evaluation for Perchloroethylene Supplemental Information on E-Fast Surface Water Modeling Outputs

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## Appendix C FATE AND TRANSPORT

### EPI Suite™ Model Inputs

To set up EPI Suite™ for estimating fate properties of PCE, PCE was identified using the “Name Lookup” function. The physical-chemical properties were input based on the values in Table 1-1. EPI Suite™ was run using default settings (i.e., no other parameters were changed or input).

The Estimation Programs Interface (EPI) Suite™ was developed by the US Environmental Protection Agency's Office of Pollution Prevention and Toxics and Syracuse Research Corporation (SRC). It is a screening-level tool, intended for use in applications such as to quickly screen chemicals for release potential and "bin" chemicals by priority for future work. Estimated values should not be used when experimental (measured) values are available.

EPI Suite™ cannot be used for all chemical substances. The intended application domain is organic chemicals. Inorganic and organometallic chemicals generally are outside the domain.

Important information on the performance, development and application of EPI Suite™ and the individual programs within it can be found under the Help tab. Copyright 2000-2012 United States Environmental Protection Agency for EPI Suite™ and all component programs except BioHCWIN and KOAWIN.

**Figure Apx C-1.** Screen capture of EPISuite™ parameters used to calculate fate and physical chemical properties for PCE.

## Appendix D ENVIRONMENTAL EXPOSURES

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14592 EPA presents the industrial sectors for each condition of use category below. In cases where the  
 14593 NPDES is unknown, no close analog could be identified, or the exact location of a chemical  
 14594 loading is unknown, surface water concentrations were modeled using the “SIC Code Option”  
 14595 within E-FAST 2014 ([U.S. EPA 2014b](#)) to estimate potential occurrence of PCE shown in  
 14596 Table\_Apx D-1.

14597

14598 EPA also conducted a geospatial analysis at the watershed level (HUC-8 and HUC-12) to  
 14599 compare the measured and predicted surface water concentrations and investigate if the facility  
 14600 releases may be associated with the observed concentrations in surface water. Below in  
 14601 Table\_Apx D-2, Table\_Apx D-3 and Table\_Apx D-4 EPA has broken out the occurrence of PCE  
 14602 by facility, monitoring sites and location by State.

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14604 Table\_Apx D-1 provides the industrial sectors for each condition of use.

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14606 **Table\_Apx D-1. Industry Sector Modeled for Facilities without Site-Specific Flow Data in**  
 14607 **E-FAST 2014**

Condition of Use	Industry Sector (SIC Code Option)
OES: Manufacturing	Organic Chemicals Manufacture
OES: Import/Repackaging	POTW (Industrial)
OES: Processing as a Reactant	Organic Chemicals Manufacture
OES: Incorporation into Formulation	n/a
OES: OTVD (Includes releases for Closed-Loop Degreasing, Conveyorized Degreasing, Web Degreasing, Cold Cleaning, and Metalworking Fluids)	Primary Metal Forming Manufacture
OES: Aerosol Degreasing/Lubricants	n/a
OES: Dry Cleaning (commercial only)	n/a
OES: Dry Cleaning (industrial only)	n/a
OES: Adhesives, Paints, and Coatings	n/a
OES: Chemical Maskant	Metal Finishing
OES: Industrial Processing Aid	POTW (Industrial)
OES: Wipe Cleaning and Metal/Stone Polishes	n/a
OES: Other Spot Cleaning/Spot Removers (Including Carpet Cleaning)	n/a
OES: Other Industrial Uses	POTW (Industrial)
OES: Other Commercial Uses	POTW (Industrial)
OES: Waste Handling, Disposal, Treatment, and Recycling	POTW (Industrial)

14608

14609 n/a = Not applicable because a NPDES or surrogate NPDES was available in E-FAST 2014 ([U.S. EPA 2014b](#)) to  
 14610 obtain a site-specific stream flow for all facilities within the OES.

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14612 Table\_Apx D-2 and Table\_Apx D-3 show the occurrence of PCE release via facilities and  
 14613 monitoring sites for HUC 8 and HUC 12 respectively.  
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14615 **Table\_Apx D-2. Occurrence of PCE Releases (Facilities) and Monitoring Sites By HUC-8.**

HUC8	Name	Acres	Square km	States	No. of Facilities	No. of Monitoring Sites	No. of Monitoring Samples in HUC
<b>Co-located PCE Releases (Facilities) and Monitoring Sites (n = 4 HUCs)</b>							
04040001	Little Calumet-Galien	440799.0	1783.8	IL,IN,MI	1	2	5
04050006	Lower Grand	1293837.6	5236.0	MI	1	1	4
07040001	Rush-Vermillion	711813.5	2880.6	MN,WI	1	1	1
11030012	Little Arkansas	910452.3	3684.5	KS	1	5	14
<b>PCE Releases (Facilities) Only (n = 66 HUCs)</b>							
10190003	Middle South Platte-Cherry Creek	1838438.0	7439.9	CO	5	0	0
02030105	Raritan	707463.2	2863.0	NJ	4	0	0
08080206	Lower Calcasieu	812177.5	3286.8	LA	4	0	0
12040104	Buffalo-San Jacinto	756769.3	3062.5	TX	4	0	0
02060003	Gunpowder-Patapsco	907202.4	3671.3	MD,PA	3	0	0
07120004	Des Plaines	931517.4	3769.7	IL,WI	3	0	0
08070204	Lake Maurepas	456253.8	1846.4	LA	3	0	0
02040201	Crosswicks-Neshaminy	347995.5	1408.3	NJ,PA	2	0	0
04120104	Niagara	871679.6	3527.6	CN,NY	2	0	0
05030201	Little Muskingum-Middle Island	1161545.0	4700.6	OH,WV	2	0	0
07090002	Middle Rock	1172085.4	4743.3	IL,WI	2	0	0
07120005	Upper Illinois	644077.9	2606.5	IL	2	0	0
08090301	East Central Louisiana Coastal	1728228.3	6993.9	LA	2	0	0
12020003	Lower Neches	709968.8	2873.1	TX	2	0	0
12040204	West Galveston Bay	776232.4	3141.3	TX	2	0	0
18070106	San Gabriel	579966.3	2347.0	CA	2	0	0
01090001	Charles	955681.2	3867.5	MA	1	0	0
02030103	Hackensack-Passaic	725724.6	2936.9	NJ,NY	1	0	0
02030104	Sandy Hook-Staten Island	454261.8	1838.3	NJ,NY	1	0	0
02060002	Chester-Sassafras	833436.9	3372.8	DE,MD,PA	1	0	0
03050107	Tyger	517390.6	2093.8	SC	1	0	0
03050111	Lake Marion	351158.0	1421.1	SC	1	0	0
03050204	South Fork Edisto	555149.8	2246.6	SC	1	0	0
03090206	Florida Southeast Coast	2352752.2	9521.3	FL	1	0	0
03160103	Buttahatchee	553396.1	2239.5	AL,MS	1	0	0
03160112	Upper Black Warrior	797270.7	3226.4	AL	1	0	0

**PEER REVIEW DRAFT. DO NOT CITE OR QUOTE**

<b>HUC8</b>	<b>Name</b>	<b>Acres</b>	<b>Square km</b>	<b>States</b>	<b>No. of Facilities</b>	<b>No. of Monitoring Sites</b>	<b>No. of Monitoring Samples in HUC</b>
03160113	Lower Black Warrior	929969.4	3763.5	AL	1	0	0
04060101	Pere Marquette-White	1333169.6	5395.1	MI	1	0	0
04080201	Tittabawassee	926364.9	3748.9	MI	1	0	0
04110003	Ashtabula-Chagrin	401605.3	1625.2	OH,PA	1	0	0
04120103	Buffalo-Eighteenmile	457151.3	1850.0	NY	1	0	0
04120200	Lake Erie	6483450.8	26237.6	CN,MI,NY,OH,PA	1	0	0
04130001	Oak Orchard-Twelvemile	685684.0	2774.9	CN,NY	1	0	0
04150403	Winooski River	680464.2	2753.7	VT	1	0	0
05020003	Upper Monongahela	296728.7	1200.8	PA,WV	1	0	0
05030101	Upper Ohio	1271402.1	5145.2	OH,PA,WV	1	0	0
05040006	Licking	499187.6	2020.1	OH	1	0	0
05050008	Lower Kanawha	591554.2	2393.9	WV	1	0	0
05080001	Upper Great Miami, Indiana, Ohio	1607903.9	6507.0	IN,OH	1	0	0
05080002	Lower Great Miami, Indiana, Ohio	883871.2	3576.9	IN,OH	1	0	0
05120201	Upper White	1740657.8	7044.2	IN	1	0	0
05140101	Silver-Little Kentucky	807385.6	3267.4	IN,KY	1	0	0
07120003	Chicago	419754.7	1698.7	IL,IN	1	0	0
07120006	Upper Fox	988245.7	3999.3	IL,WI	1	0	0
07140106	Big Muddy	1526746.1	6178.5	IL	1	0	0
08070201	Bayou Sara-Thompson	444709.9	1799.7	LA,MS	1	0	0
10190004	Clear	365027.3	1477.2	CO	1	0	0
11030017	Upper Walnut River	620982.8	2513.0	KS	1	0	0
11110104	Robert S. Kerr Reservoir	1128010.3	4564.9	AR,OK	1	0	0
11130303	Middle Washita	1605161.6	6495.9	OK	1	0	0
12030102	Lower West Fork Trinity	969001.7	3921.4	TX	1	0	0
12040201	Sabine Lake	636218.6	2574.7	LA,TX	1	0	0
12070104	Lower Brazos	1051241.4	4254.2	TX	1	0	0
12110201	North Corpus Christi Bay	111266.8	450.3	TX	1	0	0
12110202	South Corpus Christi Bay	322454.2	1304.9	TX	1	0	0
16020204	Jordan	520846.5	2107.8	UT	1	0	0
17020010	Upper Columbia-Entiat	958508.9	3878.9	WA	1	0	0
17050114	Lower Boise	850233.1	3440.8	ID	1	0	0
17110012	Lake Washington	388533.5	1572.3	WA	1	0	0
18050002	San Pablo Bay	784983.8	3176.7	CA	1	0	0
18070102	Santa Clara	1040515.7	4210.8	CA	1	0	0
18070203	Santa Ana	1084241.9	4387.8	CA	1	0	0

**PEER REVIEW DRAFT. DO NOT CITE OR QUOTE**

<b>HUC8</b>	<b>Name</b>	<b>Acres</b>	<b>Square km</b>	<b>States</b>	<b>No. of Facilities</b>	<b>No. of Monitoring Sites</b>	<b>No. of Monitoring Samples in HUC</b>
<b>PCE Monitoring Sites Only (n = 47 HUCs)</b>							
02020004	Mohawk	1632666.9	6607.2	NY	0	1	1
02040105	Middle Delaware-Musconetcong	869995.3	3520.8	NJ,PA	0	1	3
02050205	Pine	627641.5	2540.0	PA	0	1	2
02050206	Lower West Branch Susquehanna	1158170.9	4687.0	PA	0	1	3
02050301	Lower Susquehanna-Penns	926808.1	3750.7	PA	0	1	6
02070004	Conococheague-Opequon	1457399.0	5897.9	MD,PA,VA,WV	0	2	6
04010201	St. Louis	1882043.1	7616.4	MN,WI	0	1	4
04010302	Bad-Montreal	832709.3	3369.9	MI,WI	0	1	4
04030101	Manitowoc-Sheboygan	1043247.9	4221.9	WI	0	1	4
04030204	Lower Fox	414795.8	1678.6	WI	0	1	3
04040002	Pike-Root	267751.0	1083.5	IL,WI	0	1	4
04050001	St. Joseph	3016829.4	12208.7	IN,MI	0	1	4
04050003	Kalamazoo	1300194.9	5261.7	MI	0	1	1
04080206	Saginaw	160773.8	650.6	MI	0	1	4
04090003	Clinton	510065.3	2064.2	MI	0	1	4
04090004	Detroit	567874.0	2298.1	CN,MI	0	1	4
04100009	Lower Maumee	689823.7	2791.6	OH	0	9	17
04100012	Huron-Vermilion	488453.3	1976.7	OH	0	1	3
04110001	Black-Rocky	572567.0	2317.1	OH	0	1	1
04110002	Cuyahoga	519309.5	2101.6	OH	0	1	3
04130003	Lower Genesee	682891.3	2763.6	NY	0	1	4
04140101	Irondequoit-Ninemile	445757.0	1803.9	NY	0	1	3
04140203	Oswego	93064.4	376.6	NY	0	1	4
06030003	Upper Elk	821468.2	3324.4	AL,TN	0	4	8
07090004	Sugar	486750.9	1969.8	IL,WI	0	1	3
07140102	Meramec	1375977.1	5568.4	MO	0	4	7
08040302	Castor	612659.1	2479.3	LA	0	2	3
10300102	Lower Missouri-Moreau	2176536.7	8808.1	MO	0	1	1
11140207	Lower Red-Lake Iatt	912489.8	3692.7	LA	0	3	3
11140209	Black Lake Bayou	579878.2	2346.7	LA	0	1	2
12100303	Lower San Antonio	950344.1	3845.9	TX	0	1	1
13020201	Rio Grande-Santa Fe	1197851.1	4847.5	NM	0	1	3
13020203	Rio Grande-Albuquerque	2057935.0	8328.2	NM	0	1	3
14030005	Upper Colorado-Kane Springs	1455869.5	5891.7	CO,UT	0	5	9
14060008	Lower Green	1195181.0	4836.7	UT	0	1	2

PEER REVIEW DRAFT. DO NOT CITE OR QUOTE

HUC8	Name	Acres	Square km	States	No. of Facilities	No. of Monitoring Sites	No. of Monitoring Samples in HUC
15010008	Upper Virgin	1397207.4	5654.3	UT	0	2	2
15060106	Lower Salt	666211.2	2696.1	AZ	0	5	12
15070102	Aqua Fria	1758350.5	7115.8	AZ	0	7	11
17090001	Middle Fork Willamette	874861.9	3540.4	OR	0	1	1
17090002	Coast Fork Willamette	426542.2	1726.2	OR	0	2	2
17090003	Upper Willamette	1198500.4	4850.2	OR	0	3	5
17090004	Mckenzie	857010.6	3468.2	OR	0	4	5
21010005	Eastern Puerto Rico	914478.3	3700.8	PR	0	1	2

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14618 **Table\_Apx D-3. Occurrence of PCE Releases (Facilities) and Monitoring Sites By HUC-12.**

HUC8	Name	Acres	Square km	States	No. of Facilities	No. of Monitoring Sites	No. of Monitoring Samples in HUC
<b>Co-located PCE Releases (Facilities) and Monitoring Sites (n = 1 HUC)</b>							
040400010509	Willow Creek-Burns Ditch	13501.8	54.6	IN	1	1	1
<b>PCE Releases (Facilities) Only (n =81 HUCs)</b>							
010900010402	Outlet Saugus River	17633.5	71.4	MA	1	0	0
020301030802	Peckman River-Passaic River	22354.8	90.5	NJ	1	0	0
020301040204	Morses Creek-Arthur Kill	18931.5	76.6	NJ,NY	1	0	0
020301050306	Devils Brook	9890.5	40.0	NJ	1	0	0
020301050312	Lower Millstone River	31839.8	128.8	NJ	1	0	0
020301050504	Green Brook	32590.3	131.9	NJ	1	0	0
020301050505	Lawrence Brook	29837.9	120.8	NJ	1	0	0
020402010202	West Branch Neshaminy Creek	15964.6	64.6	PA	1	0	0
020402010404	Van Sciver Lake-Delaware River	16914.3	68.5	NJ,PA	1	0	0
020600020202	Little Elk Creek	26942.3	109.0	MD,PA	1	0	0
020600030902	Dead Run-Gywnns Falls	31450.3	127.3	MD	3	0	0
030501070305	Lower South Tyger River	29288.0	118.5	SC	1	0	0
030501110109	Lake Marion-Santee River	165146.0	668.3	SC	1	0	0
030502040108	Lower Shaw Creek	32220.3	130.4	SC	1	0	0
030902061003	Lake Worth Inlet-Boynton Inlet Frontal	39017.9	157.9	FL	1	0	0
031601030202	Cannon Mill Creek-Beaver Creek	28263.4	114.4	AL	1	0	0
031601120101	Headwaters Valley Creek	34201.6	138.4	AL	1	0	0
031601130204	Goose Pond-Black Warrior River	25818.5	104.5	AL	1	0	0
040500060712	Lloyd Bayou-Grand River	31929.6	129.2	MI	1	0	0
040601010904	White Lake-White River	39040.6	158.0	MI	1	0	0
040802010604	Prairie Creek-Tittabawassee River	25251.7	102.2	MI	1	0	0
041100030504	Doan Brook-Frontal Lake Erie	28193.7	114.1	OH	1	0	0
041201030401	Smoke Creek	21267.2	86.1	NY	1	0	0
041201040604	City of North Tonawanda-Niagara River	8541.4	34.6	NY	1	0	0
041201040605	Niagara Falls-Niagara River	21666.5	87.7	CN,NY	1	0	0
041202000300	Lake Erie	6359988.3	25738.0	CN,MI,NY,OH,PA	1	0	0
041300010703	Headwaters Eighteenmile Creek	15270.7	61.8	NY	1	0	0
041504030101	Headwaters Stevens Branch	22103.3	89.5	VT	1	0	0
050200030307	Cobun Creek-Monongahela River	21730.5	87.9	WV	1	0	0
050301011103	Carpenter Run-Ohio River	23323.8	94.4	OH,PA,WV	1	0	0
050302011004	Haynes Run-Ohio River	19386.4	78.5	OH,WV	2	0	0
050400060409	Beaver Run-South Fork Licking River	19150.9	77.5	OH	1	0	0

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HUC8	Name	Acres	Square km	States	No. of Facilities	No. of Monitoring Sites	No. of Monitoring Samples in HUC
050500080304	Scary Creek-Kanawha River	20472.1	82.8	WV	1	0	0
050800012005	Poplar Creek-Great Miami River	34854.0	141.1	OH	1	0	0
050800020105	Town of Oakwood-Great Miami River	16944.9	68.6	OH	1	0	0
051202011205	Dollar Hide Creek-White River	30882.8	125.0	IN	1	0	0
051401010903	Mill Creek Cutoff	20966.7	84.8	KY	1	0	0
070400010206	Town of Pine Bend	31880.6	129.0	MN	1	0	0
070900021402	Delavan Lake	22265.1	90.1	WI	1	0	0
070900021502	City of Beloit-Rock River	30612.6	123.9	IL,WI	1	0	0
071200030407	Grand Calumet River-Little Calumet River	17191.8	69.6	IL,IN	1	0	0
071200040905	Des Plaines River	23822.3	96.4	IL	3	0	0
071200050106	Walley Run-Aux Sable Creek	12878.4	52.1	IL	1	0	0
071200050705	Bills Run-Illinois River	33003.8	133.6	IL	1	0	0
071200061206	Jelkes Creek-Fox River	25551.9	103.4	IL	1	0	0
071401060407	Ewing Creek	14114.5	57.1	IL	1	0	0
080702010402	Devils Swamp-Bayou Baton Rouge	17328.4	70.1	LA	1	0	0
080702040101	Bayou Francois	16194.6	65.5	LA	1	0	0
080702040103	Grand Goudine Bayou-New River	17644.3	71.4	LA	1	0	0
080702040302	Hope Canal-Pipeline Canal	18663.6	75.5	LA	1	0	0
080802060301	Maple Fork-Bayou d'Inde	22308.4	90.3	LA	2	0	0
080802060302	Bayou Verdine-Calcasieu River	24546.0	99.3	LA	1	0	0
080802060303	Prien Lake-Calcasieu River	29606.9	119.8	LA	1	0	0
080903010307	Town of Westwego-Main Canal	39569.2	160.1	LA	2	0	0
101900030304	Cherry Creek-South Platte River	35554.2	143.9	CO	5	0	0
101900040404	Outlet Clear Creek	19355.3	78.3	CO	1	0	0
110300120204	Headwaters Dry Turkey Creek	30940.1	125.2	KS	1	0	0
110300170403	Constant Creek-Walnut River	28347.5	114.7	KS	1	0	0
111101040611	Massard Creek	10720.0	43.4	AR	1	0	0
111303030708	Outlet Caddo Creek	26104.7	105.6	OK	1	0	0
120200030406	Union Canal-Neches River	26733.6	108.2	TX	1	0	0
120200030407	Grays Bayou-Neches River	39760.5	160.9	TX	1	0	0
120301020206	Brogden Branch-Town Creek	14887.3	60.3	TX	1	0	0
120401040703	Vince Bayou-Buffalo Bayou	38130.8	154.3	TX	3	0	0
120401040706	Goose Creek-Frontal Galveston Bay	37289.7	150.9	TX	1	0	0
120402010300	Salt Bayou	212334.8	859.3	TX	1	0	0
120402040100	Clear Creek-Frontal Galveston Bay	190566.3	771.2	TX	1	0	0

**PEER REVIEW DRAFT. DO NOT CITE OR QUOTE**

HUC8	Name	Acres	Square km	States	No. of Facilities	No. of Monitoring Sites	No. of Monitoring Samples in HUC
120402040400	Mustang Bayou	183973.7	744.5	TX	1	0	0
120701040505	Outlet Barzos River	35803.4	144.9	TX	1	0	0
121102010001	Rincon Bayou	28406.5	115.0	TX	1	0	0
121102020107	Tule Lake	12284.3	49.7	TX	1	0	0
160202040304	City Creek	11166.6	45.2	UT	1	0	0
170200100307	Rainey Spring-Columbia River	21142.9	85.6	WA	1	0	0
170501140403	Crane Creek-Boise River	18624.7	75.4	ID	1	0	0
171100120301	Bear Creek	30140.7	122.0	WA	1	0	0
180500020801	San Pablo Bay Estuaries	85721.1	346.9	CA	1	0	0
180701020507	Gorman Creek	23547.6	95.3	CA	1	0	0
180701060102	Lower Dominguez Channel	36125.6	146.2	CA	1	0	0
180701060701	Long Beach Harbor	33394.5	135.1	CA	1	0	0
180701060703	San Pedro Bay	40623.1	164.4	CA	1	0	0
180702031003	Greenville Banning Channel-Santa Ana River	22359.3	90.5	CA	1	0	0
<b>PCE Monitoring Sites Only (n = 67 HUCs)</b>							
020200040908	Lower Canajoharie Creek	13216.2	53.5	NY	0	1	1
020401050911	Buck Creek-Delaware River	15442.9	62.5	NJ,PA	0	1	3
020502050607	Furnace Run-Pine Creek	27631.1	111.8	PA	0	1	2
020502061103	Beaver Run-Chillisquaque Creek	26019.5	105.3	PA	0	1	3
020503010603	Lower West Branch Mahantango Creek	13445.1	54.4	PA	0	1	6
020700040702	Dennis Creek-Back Creek	32533.8	131.7	PA	0	1	4
020700041009	Sharmans Branch-Antietam Creek	36619.8	148.2	MD	0	1	2
040102011503	City of Cloquet-Saint Louis River	36671.5	148.4	MN	0	1	4
040103020702	Camerons Creek-Bad River	13498.0	54.6	WI	0	1	4
040301010605	Manitowoc River	11648.4	47.1	WI	0	1	4
040302040405	City of Green Bay-Fox River	19046.2	77.1	WI	0	1	3
040400010603	Calumet River-Frontal Lake Michigan	34563.8	139.9	IL,IN	0	1	4
040400020101	Wind Point-Frontal Lake Michigan	16148.3	65.3	WI	0	1	4
040500012210	City of Niles-Saint Joseph River	8758.5	35.4	MI	0	1	4
040500030911	Peach Orchid Creek-Kalamazoo River	15046.6	60.9	MI	0	1	1
040500060708	Jubb Bayou-Grand River	11389.8	46.1	MI	0	1	4
040802060201	Crow Island-Saginaw River	33918.2	137.3	MI	0	1	4
040900030402	Cranberry Marsh Drain-Clinton River	21236.7	85.9	MI	0	1	4
040900040406	Ashcroft Sherwood Drain-River Rouge	12735.6	51.5	MI	0	1	4

**PEER REVIEW DRAFT. DO NOT CITE OR QUOTE**

HUC8	Name	Acres	Square km	States	No. of Facilities	No. of Monitoring Sites	No. of Monitoring Samples in HUC
041000090509	Lower Beaver Creek	10727.3	43.4	OH	0	1	2
041000090510	Lick Creek-Maumee River	14952.3	60.5	OH	0	1	2
041000090603	Haskins Road Ditch-Maumee River	10054.5	40.7	OH	0	1	1
041000090804	Heilman Ditch-Swan Creek	23569.6	95.4	OH	0	1	2
041000090903	Crooked Creek-Maumee River	12075.0	48.9	OH	0	2	5
041000090904	Delaware Creek-Maumee River	10576.9	42.8	OH	0	3	5
041000120204	Town of Vermilion-Vermilion River	17985.5	72.8	OH	0	1	3
041100010203	Rocky River	16199.9	65.6	OH	0	1	1
041100020602	Village of Independence-Cuyahoga River	10848.3	43.9	OH	0	1	3
041300030704	Genesee River	14336.9	58.0	NY	0	1	4
041401010703	Allen Creek	20188.5	81.7	NY	0	1	3
041402030204	Oswego River	11026.9	44.6	NY	0	1	4
060300030201	Bradley Creek	30268.8	122.5	TN	0	4	8
070400010102	Lock and Dam Number Three-Mississippi River	40106.3	162.3	MN,WI	0	1	1
070900040201	Badger Mill Creek	21661.8	87.7	WI	0	1	3
071401020703	Stater Creek-Meramec River	28521.9	115.4	MO	0	1	2
071401021001	Hamilton Creek-Meramec River	34956.9	141.5	MO	0	1	2
071401021002	Grand Glaize Creek-Meramec River	29896.0	121.0	MO	0	1	2
071401021004	Meramec River	27977.7	113.2	MO	0	1	1
080403020401	Caney Creek Reservoir	26803.0	108.5	LA	0	2	3
103001020709	Black Branch-Perche Creek	12012.4	48.6	MO	0	1	1
110300120303	110300120303-Little Arkansas River	23920.3	96.8	KS	0	1	4
110300120408	City of Sedgwick-Little Arkansas River	27404.6	110.9	KS	0	4	10
111402070401	Sibley Lake	24862.2	100.6	LA	0	3	3
111402090404	Grand Bayou	34707.7	140.5	LA	0	1	2
121003030306	Salt Creek-Ecleto Creek	18817.5	76.2	TX	0	1	1
130202010209	Canada de Cochiti-Rio Grande	20418.4	82.6	NM	0	1	3
130202030107	Town of Corrales-Rio Grande	26313.8	106.5	NM	0	1	3
140300050205	Outlet Courthouse Wash	18177.4	73.6	UT	0	1	1
140300050307	Negro Bill Canyon-Colorado River	19473.5	78.8	UT	0	1	2
140300051001	Little Canyon-Colorado River	32843.3	132.9	UT	0	2	4
140300051002	Bull Canyon-Colorado River	32166.0	130.2	UT	0	1	2
140600080708	Upheaval Canyon-Green River	20259.5	82.0	UT	0	1	2
150100080109	Lower North Fork Virgin River	34874.9	141.1	UT	0	2	2
150601060202	Upper Indian Bend Wash	27058.2	109.5	AZ	0	1	3

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HUC8	Name	Acres	Square km	States	No. of Facilities	No. of Monitoring Sites	No. of Monitoring Samples in HUC
150601060306	City of Phoenix-Salt River	87618.1	354.6	AZ	0	2	4
150601060307	Town of Santa Maria-Salt River	34122.5	138.1	AZ	0	2	5
150701020606	Upper Arizona Canal Diversion Channel	15465.9	62.6	AZ	0	1	3
150701020607	Lower Arizona Canal Diversion Channel	19739.1	79.9	AZ	0	1	1
150701020806	Middle Skunk Creek	28304.4	114.5	AZ	0	1	3
150701020807	Lower Skunk Creek	24449.6	98.9	AZ	0	2	2
150701020809	City of Peoria-New River	38282.5	154.9	AZ	0	2	2
170900011003	Mill Race-Middle Fork Willamette River	12666.2	51.3	OR	0	1	1
170900020405	Papenfus Creek-Coast Fork Willamette River	17460.5	70.7	OR	0	2	2
170900030601	Sring Creek-Willamette River	29305.8	118.6	OR	0	3	5
170900040705	Camp Creek	16999.1	68.8	OR	0	1	1
170900040706	Walterville Canal-McKenzie River	33735.2	136.5	OR	0	3	4
210100050503	Cienaga de las Cucharillas Drainage Watershed	6557.0	26.5	PR	0	1	2

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14621 Table\_Apx D-4 provides a list of states/territories with facilities that have releases of PCE and/or  
 14622 monitoring sites for the year of 2016

14623 **Table\_Apx D-4. States with Monitoring Sites or Facilities in 2016**

State Name	PCE Facility <sup>a</sup>	PCE Monitoring Site	PCE Facility or Monitoring Site
Alabama	X		X
Arizona		X	X
Arkansas	X		X
California	X		X
Colorado	X		X
Florida	X		X
Idaho	X		X
Illinois	X		X
Indiana	X	X	X
Kansas	X	X	X
Kentucky	X		X
Louisiana	X	X	X
Maryland	X	X	X
Massachusetts	X		X
Michigan	X	X	X
Minnesota	X	X	X
Missouri		X	X
New Jersey	X	X	X
New Mexico		X	X
New York	X	X	X
Ohio	X	X	X
Oklahoma	X		X
Oregon		X	X
Pennsylvania	X	X	X
Puerto Rico		X	X
South Carolina	X		X
Tennessee		X	X
Texas	X	X	X
Utah	X	X	X
Vermont	X		X
Washington	X		X
West Virginia	X		X
Wisconsin	X	X	X
<b>Total</b>	<b>27</b>	<b>19</b>	<b>33</b>

14624 a. PCE Facility is based on the location of the facility mapped. For indirect releasers, the receiving  
 14625 facility was mapped if known.

## Appendix E BENCHMARK DOSE ANALYSIS

The following is a summary of the cancer dose response modeling from Appendix D of U.S. EPA (2012e).

### E.1 Model Selection Details for Tumor Sites from JISA (1993)

**Table\_Apx E-1. Model predictions for hepatocellular tumors in male mice (JISA, 1993)<sup>a</sup>, using several dose metrics and multistage cancer model**

Model stages	Goodness of fit			BMD <sub>10</sub>	BMDL <sub>10</sub>	Conclusion
	<i>p</i> -value <sup>b</sup>	Largest standardized residual(s)	AIC			
<b>Total liver oxidative metabolism (mg/kg<sup>0.75</sup>-day)</b>						
<b>One</b>	<b>0.24</b>	<b>1.1, low-dose -1.2, mid-dose</b>	<b>239.7</b>	<b>2.9</b>	<b>2.1</b>	All three fits were adequate by conventional criteria. <sup>b</sup> There was no statistical improvement in adding higher-order coefficients (using likelihood ratio test); one-stage fit was selected.
Two	0.16	-0.7, control 1.1, low-dose	240.8	6.4	2.2	
Three	0.18	-0.7, control 1.0, low-dose	240.6	6.5	2.2	
<b>TCA AUC in liver (mg-hr/L-day)</b>						
<b>One</b>	<b>0.25</b>	<b>1.0, low-dose -1.2, mid-dose</b>	<b>239.7</b>	<b>97.1</b>	<b>68.8</b>	All three fits were adequate by conventional criteria. <sup>b</sup> There was no statistical improvement in adding higher-order coefficients (using likelihood ratio test); one-stage fit was selected.
Two	0.17	-0.7, control 1.1, low-dose	240.8	209.9	72.8	
Three	0.19	-0.7, control 1.0, low-dose	240.6	213.9	73.8	
<b>Administered PCE concentration (ppm)</b>						
<b>One</b>	<b>0.27</b>	<b>1.2, low-dose -1.0, mid-dose</b>	<b>239.5</b>	<b>3.9</b>	<b>2.7</b>	All three fits were adequate by conventional criteria. <sup>b</sup> There was no statistical improvement in adding higher-order coefficients (using likelihood ratio test); one-stage fit was selected.
Two	0.16	-0.8, control 1.1, low-dose	240.9	9.0	2.8	
Three	0.17	-0.8, control 1.1, low-dose	240.8	8.2	2.9	

<sup>a</sup> Incidence data and human equivalent continuous exposure estimates provided in Table 3-6.

<sup>b</sup> Goodness-of-fit *p*-values <0.05 for a preferred model, or <0.10 when considering many models, fail to meet conventional goodness-of-fit criteria. In addition, visual fit and residuals (within ±2 units) are considered. Best-fit model is highlighted in bold; output for best-fit models provided in following pages.

AIC = Akaike's Information Criteria, BMD = benchmark dose, BMDL = lower bound benchmark dose.

E.1.1 Modeling Output for Male Mice, Hepatocellular Tumors (JISA, 1993)

E.1.1.1 With total oxidative metabolism in liver as dose metric

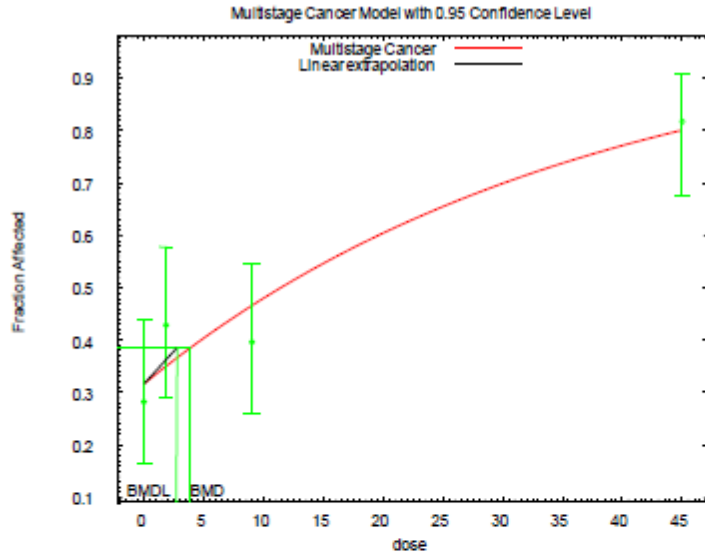


Figure D-1 One-degree multistage model fit to hepatocellular tumors in male mice (JISA, 1993), with BMD and BMDL at 10% extra risk, using total oxidative metabolism in liver (mg/kg<sup>0.75</sup>-day).

Multistage Cancer Model. (Version: 1.7; Date: 05/16/2008)

The form of the probability function is:

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

The parameter betas are restricted to be positive

Dependent variable = Response  
Independent variable = Dose

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

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

Default Initial Parameter Values  
 Background = 0.285739  
 Beta(1) = 0.0395068

Asymptotic Correlation Matrix of Parameter Estimates

	Background	Beta(1)
Background	1	-0.53
Beta(1)	-0.53	1

Parameter Estimates

Variable	Estimate	Std. Err.	95.0% Wald Confidence Interval	
			Lower Conf. Limit	Upper Conf. Limit
Background	0.301268	*	*	*
Beta(1)	0.0361674	*	*	*

\* - Indicates that this value is not calculated.

Analysis of Deviance Table

Model	Log(likelihood)	# Param's	Deviance	Test d.f.	P-value
Full model	-116.442	4			
Fitted model	-117.844	2	2.80477	2	0.246
Reduced model	-132.99	1	33.0977	3	<.0001

AIC: 239.688

Goodness of Fit

Dose	Est. Prob.	Expected	Observed	Size	Scaled Residual
0.0000	0.3013	13.858	13.000	46	-0.276
2.2500	0.3559	17.438	21.000	49	1.063
8.3000	0.4825	23.158	19.000	48	-1.201
33.6000	0.7927	38.844	40.000	49	0.408

Chi^2 = 2.81      d.f. = 2      P-value = 0.2448

Benchmark Dose Computation

Specified effect = 0.1  
 Risk Type = Extra risk  
 Confidence level = 0.95  
 BMD = 2.91314  
 BMDL = 2.06187  
 BMDU = 4.49484

Taken together, (2.06187, 4.49484) is a 90 % two-sided confidence interval for the BMD

Multistage Cancer Slope Factor = 0.0484996

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E.1.1.2 With TCA AUC in liver as dose metric

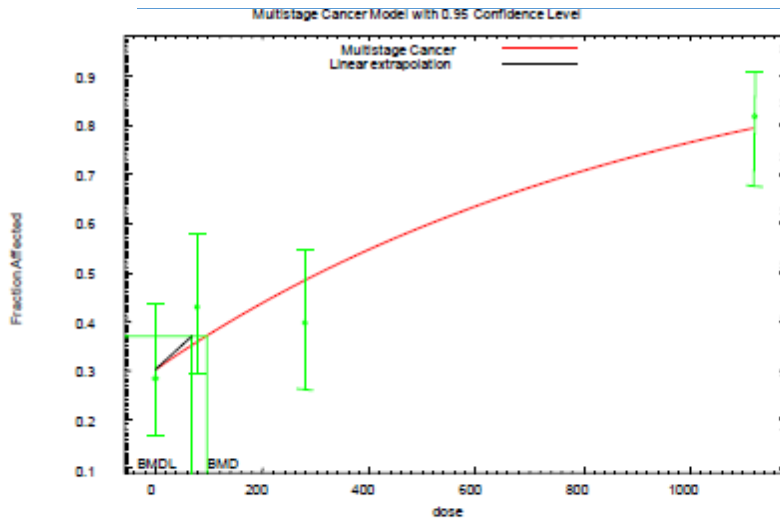


Figure D-2. One-degree multistage model fit to hepatocellular tumors in male mice (JISA, 1993), with BMD and BMDL at 10% extra risk, using TCA AUC as dose metric (mg-hr/L-d).

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Multistage Cancer Model. (Version: 1.7; Date: 05/16/2008)

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The form of the probability function is:

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

The parameter betas are restricted to be positive

Dependent variable = Response  
Independent variable = Dose

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

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

Default Initial Parameter Values  
Background = 0.283935  
Beta(1) = 0.00118591

Asymptotic Correlation Matrix of Parameter Estimates

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	Background	Beta(1)
Background	1	-0.53
Beta(1)	-0.53	1

Parameter Estimates

Variable	Estimate	Std. Err.	95.0% Wald Confidence Interval	
			Lower Conf. Limit	Upper Conf. Limit
Background	0.299803	*	*	*
Beta(1)	0.0010848	*	*	*

\* - Indicates that this value is not calculated.

Analysis of Deviance Table

Model	Log(likelihood)	# Param's	Deviance	Test d.f.	P-value
Full model	-116.442	4			
Fitted model	-117.833	2	2.78303	2	0.2487
Reduced model	-132.99	1	33.0977	3	<.0001
AIC:	239.666				

Goodness of Fit

Dose	Est. Prob.	Expected	Observed	Size	Scaled Residual
0.0000	0.2998	13.791	13.000	46	-0.255
78.4900	0.3570	17.491	21.000	49	1.046
279.7000	0.4831	23.186	19.000	48	-1.209
1121.1000	0.7925	38.832	40.000	49	0.411

Chi^2 = 2.79      d.f. = 2      P-value = 0.2477

Benchmark Dose Computation

Specified effect = 0.1  
 Risk Type = Extra risk  
 Confidence level = 0.95  
 BMD = 97.1242  
 BMDL = 68.7915  
 BMDU = 149.76

Taken together, (68.7915, 149.76 ) is a 90 % two-sided confidence interval for the BMD

Multistage Cancer Slope Factor = 0.00145367

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E.1.1.3 With administered PCE concentration (ppm) as dose metric

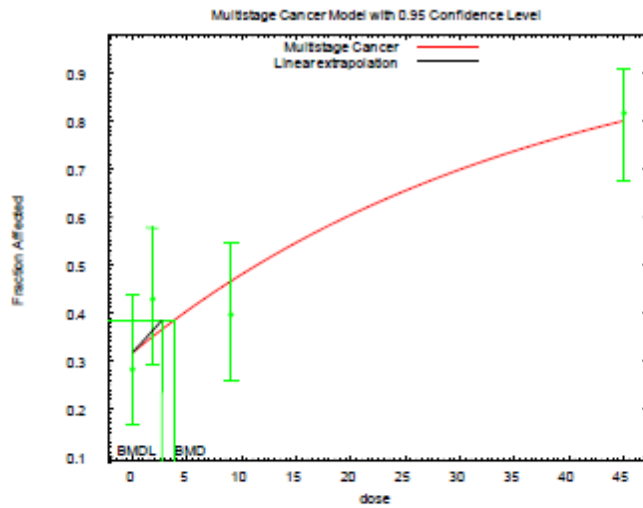


Figure D-3. One-degree multistage model fit to hepatocellular tumors in male mice (JISA, 1993), with BMD and BMDL at 10% extra risk, using administered tetrachloroethylene concentration (ppm).

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 Multistage Cancer Model. (Version: 1.7; Date: 05/16/2008)  
 =====

The form of the probability function is:

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

The parameter betas are restricted to be positive

Dependent variable = Response  
 Independent variable = Dose

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

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

Default Initial Parameter Values  
 Background = 0.307193  
 Beta(1) = 0.0290723

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Asymptotic Correlation Matrix of Parameter Estimates

	Background	Beta(1)
Background	1	-0.48
Beta(1)	-0.48	1

Parameter Estimates

		95.0% Wald Confidence			
Interval	Variable	Estimate	Std. Err.	Lower Conf. Limit	Upper Conf.
Limit	Background	0.316506	*	*	*
	Beta(1)	0.0273229	*	*	*

\* - Indicates that this value is not calculated.

Analysis of Deviance Table

Model	Log(likelihood)	# Param's	Deviance	Test d.f.	P-value
Full model	-116.442	4			
Fitted model	-117.738	2	2.59226	2	0.2736
Reduced model	-132.99	1	33.0977	3	<.0001

AIC: 239.476

Goodness of Fit

Dose	Est. Prob.	Expected	Observed	Size	Scaled Residual
0.0000	0.3165	14.559	13.000	46	-0.494
1.8000	0.3493	17.116	21.000	49	1.164
9.0000	0.4655	22.344	19.000	48	-0.968
45.0000	0.8001	39.206	40.000	49	0.284

Chi^2 = 2.62      d.f. = 2      P-value = 0.2704

Benchmark Dose Computation

Specified effect = 0.1  
 Risk Type = Extra risk  
 Confidence level = 0.95  
 BMD = 3.85613  
 BMDL = 2.70709  
 BMDU = 5.98909

Taken together, (2.70709, 5.98909) is a 90 % two-sided confidence interval for the BMD

Multistage Cancer Slope Factor = 0.03694

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**Table\_Apx E-2. Model predictions for hepatocellular tumors in female mice (JISA, 1993)<sup>a</sup>, using several dose metrics and multistage cancer model**

Model stage	Goodness of fit			BMD <sub>10</sub>	BMDL <sub>10</sub>	Comments	Conclusions
	p-value <sup>b</sup>	Largest standardized residual(s)	AIC				
<b>Total liver oxidative metabolism (mg/kg<sup>0.75</sup>-day)</b>							
One-stage	0.14	-1.4, mid-dose	154.9	3.7	2.8	Adequate fit	Selected two-degree multistage, based on likelihood ratio test.
<b>Two-stage</b>	<b>0.82</b>	<b>-0.18, low-dose</b>	<b>152.8</b>	<b>8.4</b>	<b>4.0</b>	Adequate fit	
Three-stage	0.82	-0.18, low-dose	152.8	8.4	3.9	Adequate fit	
<b>TCA AUC in liver (mg-hr/L-day)</b>							
One-stage	0.13	-1.4, mid-dose	155.1	129	98	Adequate fit	Selected two-

Two-stage	<b>0.82</b>	<b>-0.18, low-dose</b>	<b>152.9</b>	<b>292</b>	<b>141</b>	Adequate fit	degree multistage, based on likelihood ratio test.
Three-stage	0.82	-0.18, low-dose	152.9	292	139	Adequate fit	
<b>Administered PCE concentration (ppm)</b>							
<b>One-stage</b>	<b>0.36</b>	<b>-1.1, mid-dose</b>	<b>153.0</b>	<b>5.0</b>	<b>3.8</b>	Adequate fit	Selected one-degree multistage; no statistical improvement in adding higher order parameters.
Two-, three-stage	0.83	-0.1, low-dose	152.8	9.7	4.3	Identical fits resulted from both models	

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<sup>a</sup> Incidence data provided in Table 5-13, and dose metrics provided in Table 3-6; both are included in following output.

<sup>b</sup> Values <0.05 for a preferred model, or <0.10 when considering a suite of models, fail to meet conventional goodness-of-fit criteria. In addition, visual fit and residuals (within  $\pm 2$  units) are considered. Best-fit model is highlighted in bold; output for best-fit models provided in following pages.

E.1.2 Modeling Output for Female Mice, Hepatocellular Tumors (JISA, 1993)

E.1.2.1 With total oxidative metabolism in liver as dose metric

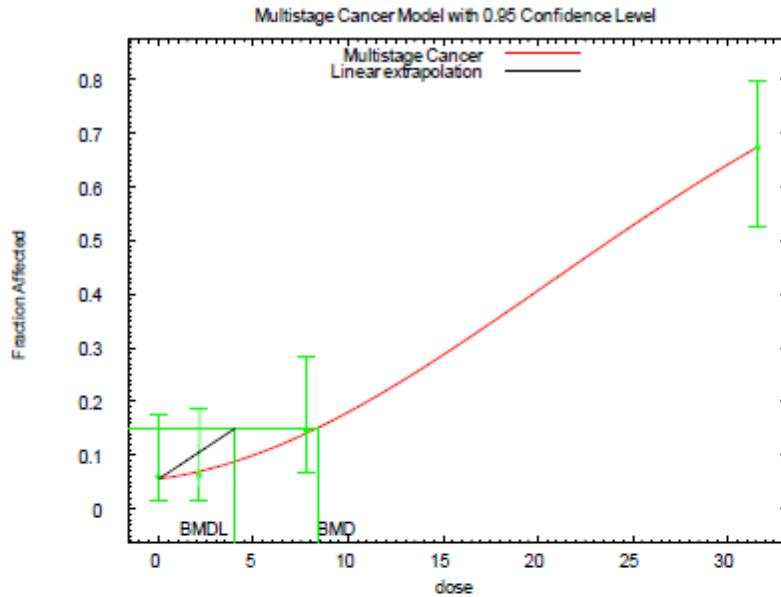


Figure D-4. Two-degree multistage model fit to hepatocellular tumors in female mice (JISA, 1993), with BMD and BMDL at 10% extra risk.

Multistage Cancer Model. (Version: 1.7; Date: 05/16/2008)  
 Input Data File: C:\Usepa\BMD821\msc\_JISA1993\_MF\_HepAC\_oxmet\_Perc3\_MultiCanc2\_0.1.(d)

The form of the probability function is:

$$P[\text{response}] = \text{background} + (1-\text{background}) * [1 - \text{EXP}(-\text{beta1} * \text{dose} - \text{beta2} * \text{dose}^2)]$$

The parameter betas are restricted to be positive

Dependent variable = Response  
 Independent variable = Dose

Total number of observations = 4  
 Total number of records with missing values = 0  
 Total number of parameters in model = 3  
 Total number of specified parameters = 0  
 Degree of polynomial = 2

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

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Default Initial Parameter Values  
 Background = 0.0554081  
 Beta(1) = 0.00569729  
 Beta(2) = 0.000883583

Asymptotic Correlation Matrix of Parameter Estimates

	Background	Beta(1)	Beta(2)
Background	1	-0.69	0.59
Beta(1)	-0.69	1	-0.97
Beta(2)	0.59	-0.97	1

Parameter Estimates

Variable	Estimate	Std. Err.	95.0% Wald Confidence Interval	
			Lower Conf. Limit	Upper Conf. Limit
Background	0.0566119	*	*	*
Beta(1)	0.00500318	*	*	*
Beta(2)	0.000907152	*	*	*

\* - Indicates that this value is not calculated.

Analysis of Deviance Table

Model	Log(likelihood)	# Param's	Deviance	Test d.f.	F-value
Full model	-73.398	4			
Fitted model	-73.4233	3	0.050713	1	0.8218
Reduced model	-106.26	1	65.7232	3	<.0001
AIC:	152.847				

Goodness of Fit

Dose	Est. Prob.	Expected	Observed	Size	Scaled Residual
0.0000	0.0566	2.831	3.000	50	0.104
2.1300	0.0704	3.311	3.000	47	-0.177
7.8000	0.1414	6.789	7.000	48	0.087
31.6000	0.6744	33.048	33.000	49	-0.015

Chi^2 = 0.05      d.f. = 1      P-value = 0.8230

Benchmark Dose Computation

Specified effect = 0.1  
 Risk Type = Extra risk  
 Confidence level = 0.95  
 BMD = 8.36661  
 BMDL = 4.02336  
 BMDU = 11.6726

Taken together, (4.02336, 11.6726) is a 90 % two-sided confidence interval for the BMD

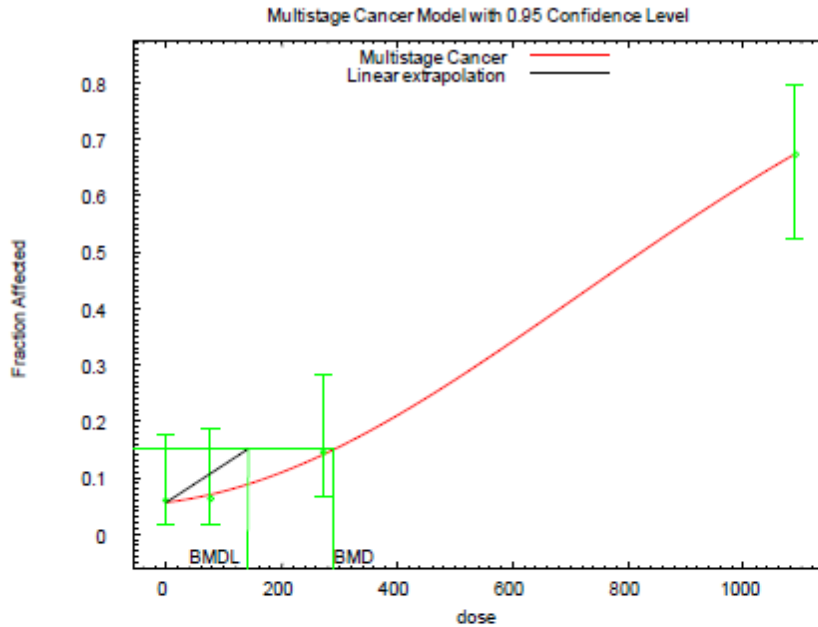
Multistage Cancer Slope Factor = 0.0248549

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**E.1.2.2 With TCA AUC in liver as dose metric**



**Figure D-5. Two-degree multistage model fit to hepatocellular tumors in female mice (JISA, 1993), with BMD and BMDL at 10% extra risk.**

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Multistage Cancer Model. (Version: 1.7; Date: 05/16/2008)
Input Data File: C:\Usepa\BMDS21\msc_JISA1993_MF_HepAC_tcaAUC_Perc3_MultiCanc2_0.1.(d)
=====

The form of the probability function is:

P[response] = background + (1-background)*[1-EXP(
  -beta1*dose^1-beta2*dose^2)]

The parameter betas are restricted to be positive

Dependent variable = Response
Independent variable = Dose

Total number of observations = 4
Total number of records with missing values = 0
Total number of parameters in model = 3
Total number of specified parameters = 0
Degree of polynomial = 2

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

Default Initial Parameter Values
Background = 0.0553149
Beta(1) = 0.000156854
    
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Beta(2) = 7.50947e-007

Asymptotic Correlation Matrix of Parameter Estimates

	Background	Beta(1)	Beta(2)
Background	1	-0.69	0.6
Beta(1)	-0.69	1	-0.97
Beta(2)	0.6	-0.97	1

Parameter Estimates

Variable	Estimate	Std. Err.	95.0% Wald Confidence Interval	
			Lower Conf. Limit	Upper Conf. Limit
Background	0.0565811	*	*	*
Beta(1)	0.000135812	*	*	*
Beta(2)	7.71737e-007	*	*	*

\* - Indicates that this value is not calculated.

Analysis of Deviance Table

Model	Log(likelihood)	# Param's	Deviance	Test d.f.	P-value
Full model	-73.398	4			
Fitted model	-73.4249	3	0.0538645	1	0.8165
Reduced model	-106.26	1	65.7232	3	<.0001

AIC: 152.85

Goodness of Fit

Dose	Est. Prob.	Expected	Observed	Size	Scaled Residual
0.0000	0.0566	2.829	3.000	50	0.105
76.9500	0.0706	3.320	3.000	47	-0.182
271.8000	0.1412	6.776	7.000	48	0.093
1089.6000	0.6745	33.051	33.000	49	-0.016

Chi^2 = 0.05      d.f. = 1      P-value = 0.8177

Benchmark Dose Computation

Specified effect = 0.1  
 Risk Type = Extra risk  
 Confidence level = 0.95  
 BMD = 291.833  
 BMDL = 141.409  
 BMDU = 402.749

Taken together, (141.409, 402.749) is a 90 % two-sided confidence interval for the BMD

Multistage Cancer Slope Factor = 0.000707168

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E.1.2.3 With administered PCE concentration (ppm) as dose metric

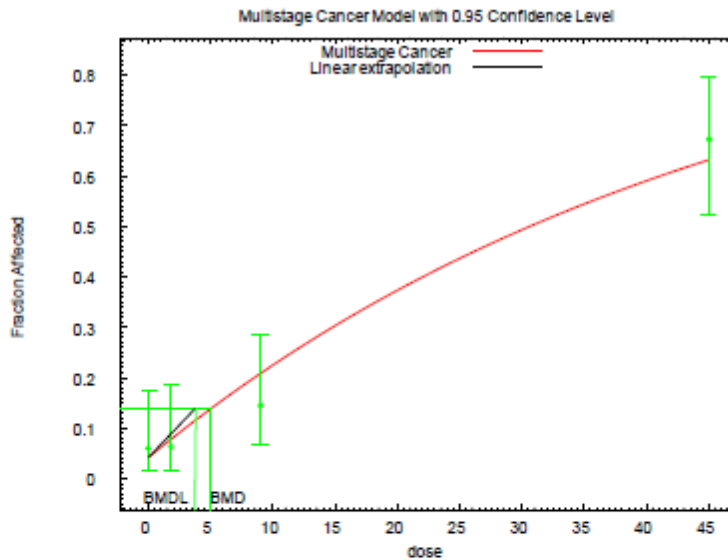


Figure D-6. One-degree multistage model fit to hepatocellular tumors in female mice (JISA, 1993), with BMD and BMDL at 10% extra risk.

Multistage Cancer Model. (Version: 1.7; Date: 05/16/2008)

The form of the probability function is:

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

The parameter betas are restricted to be positive

Dependent variable = Response  
Independent variable = Dose

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

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

Default Initial Parameter Values  
Background = 0.0124442

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Beta(1) = 0.0242761

Asymptotic Correlation Matrix of Parameter Estimates

	Background	Beta(1)
Background	1	-0.47
Beta(1)	-0.47	1

Parameter Estimates

Variable	Estimate	Std. Err.	95.0% Wald Confidence Interval	
			Lower Conf. Limit	Upper Conf. Limit
Background	0.0427836	*	*	*
Beta(1)	0.0212108	*	*	*

\* - Indicates that this value is not calculated.

Analysis of Deviance Table

Model	Log(likelihood)	# Param's	Deviance	Test d.f.	P-value
Full model	-73.398	4			
Fitted model	-74.4575	2	2.11904	2	0.3466
Reduced model	-106.26	1	65.7232	3	<.0001

AIC: 152.915

Goodness of Fit

Dose	Est. Prob.	Expected	Observed	Size	Scaled Residual
0.0000	0.0428	2.139	3.000	50	0.602
1.8000	0.0786	3.696	3.000	47	-0.377
9.0000	0.2091	10.038	7.000	48	-1.078
45.0000	0.6315	30.942	33.000	49	0.610

Chi^2 = 2.04      d.f. = 2      P-value = 0.3609

Benchmark Dose Computation

Specified effect = 0.1  
 Risk Type = Extra risk  
 Confidence level = 0.95  
 BMD = 4.96731  
 BMDL = 3.75394  
 BMDU = 6.8242

Taken together, (3.75394, 6.8242 ) is a 90 % two-sided confidence interval for the BMD

Multistage Cancer Slope Factor = 0.0266387

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## Appendix F Cancer Study Summaries

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### F.1 Epidemiological Data

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This section is a synthesis of the findings from the older epidemiological literature, as presented in the 2012 IRIS Assessment ([U.S. EPA 2012c](#)) combined with the results of the newer studies described above. Epidemiological studies provide suggestive evidence for an association between PCE exposure and tumor development in humans. Tumor types in humans with varying degrees of supporting evidence for an association with PCE exposure include NHL, MM, and bladder, esophagus, lung, liver, cervical, and breast cancer according to ([U.S. EPA 2012c](#)) and references cited therein, as well as the newer studies ([Purdue et al. 2017](#); [Mattei et al. 2014](#); [Silver et al. 2014](#); [Vizcaya et al. 2013](#); [Vlaanderen et al. 2013](#); [Gallagher et al. 2011](#); [Lipworth et al. 2011](#)).

#### F.1.1 Bladder

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([U.S. EPA 2012c](#)) concluded that, with respect to bladder cancer, the pattern of results from the studies available at that time was consistent with an elevated risk for PCE of a relatively modest magnitude (i.e., a 10–40% increased risk). The effect estimates from five of the six studies with relatively high-quality exposure assessment methodologies ranged from 1.44 to 4.03 ([U.S. EPA 2012c](#)). An exposure-response gradient was observed in a large case-control study using a semiquantitative cumulative exposure assessment, with adjusted ORs of 0.8 (95% CI = 0.6-1.2), 1.3 (95% CI = 0.9-1.7), and 1.8 (95% CI = 1.2-2.7) for medium, high, and substantial exposure, respectively, compared to low exposure. A similar exposure-response pattern was not observed in a different study that examined exposure duration, in contrast with the previously described data based on varied exposure concentration. Relative risk estimates between bladder cancer risk and ever having a job title of dry cleaner or laundry worker in four large cohort studies ranged from 1.01 to 1.44. As expected, the results from the smaller studies are more variable and less precise, reflecting their reduced statistical power. Confounding by smoking is an unlikely explanation for the findings, given the included adjustment for smoking in several case-control studies ([U.S. EPA 2012c](#)).

More recent studies provide little support for an association between bladder cancer and PCE exposure. The SMR was 0.84 (95% CI = 0.49-1.35) based on 17 observed deaths from bladder and other urinary cancers and 20.2 expected in the subset (n=5,830, sex and race combined) of a cohort of aircraft manufacturing workers judged based on detailed exposure assessment to have had routine or intermittent exposure to PCE while employed for at least 1 year between 1960 and 1996 at the Lockheed Martin aircraft manufacturing facilities in Burbank, California and followed for mortality experience through 2008 ([Lipworth et al. 2011](#)). Similarly, a cohort of workers employed 91 days or more at a microelectronics and business machine facility in New York state between 1969 and 2001 and followed through 2009 showed no association between cumulative PCE exposure score estimated from detailed exposure assessment and deaths from malignant neoplasms of the bladder and other urinary organs (HR = 0.89, 95% CI = 0.37-2.13) relative to internal referents ([Silver et al. 2014](#)). A large case-control study of incident bladder cancer cases extracted from the NOCCA cohort, which relied on a standardized job exposure matrix to estimate cumulative occupational exposure to PCE (and other agents), reported HRs of 1.00 (95% CI = 0.92-1.09, 747 cases/3,560 controls), 1.12 (95% CI = 1.02-1.23, 660 cases/2,783 controls), and 0.94 (95% CI = 0.73-1.22, 159 cases/702 controls) in low, medium, and high PCE exposure groups, respectively; the p-level for dose-response trend was 0.10 ([Hadkhale et al. 2017](#)). These results show a slight significant increase in risk of bladder cancer in the medium PCE exposure category, but no increase in the high-exposure group and no significant dose-related trend, suggesting a cause other than PCE exposure for the slight association observed in the medium-exposure group.

14719 Results from other newer studies were not informative due to small numbers of bladder cancer cases  
14720 with exposure to PCE ([Bove et al. 2014a, b](#); [Christensen et al. 2013](#)).

### 14721 **F.1.2 NHL**

14722 ([U.S. EPA 2012c](#)) concluded that results from studies of NHL available at that time indicated an  
14723 elevated risk for PCE. The results from five cohort studies that used a relatively high-quality exposure  
14724 assessment methodology generally reported relative risks between 1.7 and 3.8 ([U.S. EPA 2012c](#)). There  
14725 is some evidence of exposure-response gradients, with higher NHL risks observed in the highest  
14726 exposure categories, in studies with PCE-specific exposure measures based on intensity, duration, or  
14727 cumulative exposure. Effect estimates in studies with broader exposure assessments showed a more  
14728 variable pattern. Confounding by life-style factors is an unlikely explanation for the observed results  
14729 because common behaviors, such as smoking and alcohol use, are not strong risk factors for NHL ([U.S.  
14730 EPA 2012c](#)).

14731 Newer studies provide some support for an association between NHL and PCE exposure. In the cohort  
14732 of aircraft manufacturing workers initially studied by ([Boice et al. 1999](#)) and updated by ([Lipworth et al.  
14733 2011](#)), there was a marginally significant increase in risk of death due to NHL among workers with  
14734 routine or intermittent exposure to PCE (SMR = 1.43, 95% CI = 1.00-1.98) based on 36 observed cases  
14735 and 25.1 expected. An internal analysis based on duration of exposure (<1, 1-4, ≥5 years) to PCE,  
14736 however, did not support an association with NHL; relative risks were 1.26 (95% CI = 0.65-2.45, 11  
14737 observed), 1.00 (95% CI = 0.05-2.00, 10 observed), and 1.02 (95% CI = 0.53-1.99, 12 observed) in the  
14738 low- to high-duration exposure groups compared with unexposed factory workers ( $P_{\text{trend}} > 0.2$ ). In the  
14739 New York state cohort studied by ([Silver et al. 2014](#)), there was a nonsignificant increase in NHL risk  
14740 (HR = 1.25, 95% CI = 0.90-1.73) associated with cumulative exposure to PCE relative to internal  
14741 referents that is noteworthy because hourly male workers from the cohort as a whole showed a  
14742 significant increase in mortality due to NHL (SMR = 1.49, 95% CI = 1.15-1.89, 65 observed) and all of  
14743 the other chemical exposures assessed (trichloroethylene, methylene chloride, chlorinated hydrocarbons,  
14744 and other hydrocarbons) showed nonsignificant decreases in NHL risk with increasing cumulative  
14745 exposure in the internal analysis. A large case-control study of incident NHL cases extracted from the  
14746 NOCCA cohort found no association with cumulative PCE exposure in men, women, or both sexes  
14747 combined when analyzed by tertiles, but did find a significant or near significant risk increase in men  
14748 (but not women) with high (90<sup>th</sup> percentile) PCE exposure (HR = 1.54, 95% CI = 0.99-2.42 based on 25  
14749 cases using a cumulative exposure metric; HR = 1.74, 95% CI = 1.15-2.64 based on 30 cases using a  
14750 metric of average intensity × prevalence) ([Vlaanderen et al. 2013](#)). A study of Marine and Navy  
14751 personnel exposed to contaminated drinking water at Camp Lejeune, North Carolina between 1975 and  
14752 1985 found no association between NHL deaths (1979-2008) and exposure to PCE, as estimated by  
14753 water system modeling and housing records, but is preliminary because fewer than 6% of the cohort had  
14754 died by the end of the study ([Bove et al. 2014a, b](#)). Results from other newer studies were not  
14755 informative, primarily due to small numbers of NHL cases with exposure to PCE ([Bulka et al. 2016](#);  
14756 [Christensen et al. 2013](#); [Morales-Suárez-Varela et al. 2013](#); [Ruckart et al. 2013](#)).

### 14758 **F.1.3 MM**

14759 ([U.S. EPA 2012c](#)) concluded that results from studies of MM available at that time indicated an elevated  
14760 risk for PCE, although this was based on a smaller set of studies than available for NHL. The larger  
14761 cohort studies that used a relatively nonspecific exposure measure (broad occupational title of launderers  
14762 and dry cleaners, based on census data) did not report an increased risk of MM, with effect estimates  
14763 ranging from 0.99 to 1.07. Some uncertainty in these estimates arises from these studies' broader  
14764 exposure assessment methodology. ([U.S. EPA 2012c](#)) cited a set of results from cohort and case-control

14765 studies as providing evidence of an association between PCE exposure and MM. The strongest evidence  
14766 of association was from a case-control study that reported a nonsignificant increase in risk of MM  
14767 among those ever exposed to PCE (OR = 1.5, 95% CI = 0.8-2.9) based on 16 cases, with a significantly  
14768 increasing trend for risk with cumulative PCE exposure ( $P_{\text{trend}} = 0.02$ ) and a significant increase in risk  
14769 in the highest exposure quartile (OR = 3.3, 95% CI = 1.2-9.5) based on 10 cases. A second case-control  
14770 study had too few MM cases with PCE exposure (n=3) to perform a meaningful analysis ([U.S. EPA  
2012c](#)).

14771  
14772  
14773 Among the newer studies, the large case-control study by ([Vlaanderen et al. 2013](#)) derived from the  
14774 NOCCA cohort found no association of MM with cumulative PCE exposure in men, women, or both  
14775 sexes combined when analyzed by tertiles; slight nonsignificant risk increases were seen in women with  
14776 high (90<sup>th</sup> percentile) PCE exposure (HR = 1.14, 95% CI = 0.84-1.54 based on 52 cases using a  
14777 cumulative exposure metric; HR = 1.28, 95% CI = 0.92-1.78 based on 44 cases using a metric of  
14778 average intensity  $\times$  prevalence). Results in men were based on smaller numbers of cases and were less  
14779 stable, with high exposure based on the cumulative metric giving a HR of 1.22 (95% CI = 0.65-2.30,  
14780 12 cases) and high exposure based on average intensity  $\times$  prevalence giving a HR of 0.85 (95% CI =  
14781 0.42-1.72, 9 cases). The newer cohort studies provided no support for an association between MM and  
14782 PCE exposure. ([Lipworth et al. 2011](#)) reported an SMR of 1.07 (95% CI = 0.58-1.79) for MM in aircraft  
14783 manufacturing workers with routine or intermittent exposure to PCE based on 14 observed and 13.2  
14784 expected cases, and no relation to duration of exposure among observed cases (RR = 0.87, 1.14, and  
14785 0.34 in low-, medium-, and high-exposure duration groups). Studies by ([Silver et al. 2014](#)), ([Bove et al.  
2014a](#)), and ([Bove et al. 2014b](#)) were also negative for an association between PCE exposure and MM.

#### 14787 **F.1.4 Esophagus**

14788 ([U.S. EPA 2012c](#)) concluded there was limited suggestive evidence for an association between  
14789 esophageal cancer and PCE exposure, based on studies available at that time. The SIR in a large cohort  
14790 study (n=95 cases) using broad exposure categories was 1.18 (95% CI = 0.96-1.46). The point estimates  
14791 of the association in seven of eight smaller studies, four studies with specific exposure assessments, and  
14792 four other studies with less precise assessments were between 1.16 and 2.44 ([U.S. EPA 2012c](#)). Two  
14793 small case-control studies with relatively high-quality exposure assessment approaches reported ORs of  
14794 0.76 (95% CI = 0.34-1.69) based on 8 exposed cases and 6.4 (95% CI = 0.6-68.9) based on 2 exposed  
14795 cases, respectively. Some uncertainties in these estimates arise from the lack of job title information for  
14796 25% of the cases and 19% of the controls in one study and the small number of exposed cases in the  
14797 other study. One study examining exposure-response suggested a positive relationship, with SMRs of  
14798 2.16 (95% CI = 0.85-4.54, 5 cases) and 4.78 (95% CI = 2.68-7.91, 11 cases) for durations of <5 years  
14799 and  $\geq 5$  years, respectively ([U.S. EPA 2012c](#)). In contrast, one study did not find a trend with  
14800 exposure duration, but included only 0-3 cases per duration category, and another study found similar  
14801 risks in subjects with little to no exposure (RR = 2.1, 95% CI = 0.9-4.4, 7 cases) and medium to high  
14802 exposure (RR = 2.2, 95% CI = 1.2-3.5, 16 cases). None of the cohort studies can exclude possible  
14803 confounding from alcohol and smoking—risk factors for squamous cell carcinoma of the esophagus,  
14804 however based on smoking rates in blue-collar workers, the 2-fold estimated increase in relative risk  
14805 reported in another set of studies (RR = 2.44, 95% CI = 1.40-3.97, RR = 2.2, 95% CI = 1.5-3.3) were  
14806 higher than levels which could reasonably be attributed solely to smoking.

14807  
14808 Findings in newer studies were generally unresponsive of an association between esophageal cancer and  
14809 PCE exposure. In an update of the ([Boice et al. 1999](#)) study, ([Lipworth et al. 2011](#)) reported an SMR of  
14810 1.13 (95% CI = 0.72-1.68) for esophageal cancer among aircraft manufacturing workers with routine or  
14811 intermittent exposure to PCE (24 cases versus 21.3 expected). In the internal analysis from this study

14812 based on duration of exposure, relative risk for esophageal cancer was significantly increased in workers  
14813 with less than 1 year of exposure (RR = 2.30, 95% CI = 1.14-4.66, 11 cases), but decreased with  
14814 increasing exposure duration (in the high-duration group with exposure of 5 years or more, RR = 0.66,  
14815 95% CI = 0.22-1.96, 4 cases). Similarly, ([Bove et al. 2014a](#)) and ([Bove et al. 2014b](#)) reported decreasing  
14816 HRs of 1.27 (95% CI = 0.57-2.81, 11 cases), 0.55 (95% CI = 0.20-1.55, 5 cases), and 0.41 (95% CI =  
14817 0.13-1.26, 4 cases) for esophageal cancer in low, medium, and high cumulative PCE exposure groups,  
14818 respectively, in the Camp Lejeune cohort exposed by drinking water. The only other newer study that  
14819 evaluated this endpoint was not informative due to lack of observed cases with PCE exposure  
14820 ([Christensen et al. 2013](#)).

### 14821 **F.1.5 Kidney**

14822 ([U.S. EPA 2012c](#)) acknowledged mixed results in studies of kidney cancer available at that time,  
14823 concluding that overall the evidence was suggestive but limited. One primary study supporting an  
14824 association between PCE exposure and kidney cancer, a large international case-control study (245  
14825 exposed cases from Australia, Denmark, Germany, Sweden, and the United States), reported a relative  
14826 risk of 1.4 (95% CI = 1.1-1.7) for any exposure to dry cleaning solvents. This study was able to adjust  
14827 for smoking history, body mass index, and other risk factors for kidney cancer. Results from the large  
14828 cohort studies, using a more general exposure classification based on national census occupation data,  
14829 presented more variable results, with relative risks of 0.94, 1.11, and 1.15 ([U.S. EPA 2012c](#)). The results  
14830 from the smaller studies using a relatively specific exposure assessment approach to refine classification  
14831 of potential PCE exposure in dry cleaning settings were mixed, with some studies reporting little or no  
14832 evidence of an association and other studies reporting elevated risks ([U.S. EPA 2012c](#)). An increasing  
14833 trend in relative risk with increasing exposure surrogate was not observed in any of the larger  
14834 occupational exposure studies with three or more exposure categories but some indication of higher risk  
14835 with higher exposure (or duration) was observed in other studies ([U.S. EPA 2012c](#)).

14836  
14837 Mixed results were obtained in newer studies as well. A case-control study of kidney cancer cases from  
14838 Detroit, Michigan and Chicago, Illinois using detailed exposure assessment methodology found no  
14839 significant association with probability of exposure to PCE, or with PCE exposure duration, average  
14840 weekly exposure or cumulative exposure for those with  $\geq 50\%$  probability of exposure, but did observe a  
14841 significant increase in kidney cancer risk for those in the highest tertile of cumulative hours exposed  
14842 when the analysis was restricted to those with high-intensity exposure to PCE (OR = 3.1, 95% CI = 1.3-  
14843 7.4, 14 cases/8 controls,  $P_{\text{trend}} = 0.03$ ) ([Purdue et al. 2017](#)). This relationship was also seen in additional  
14844 analyses that incorporated 5-year (OR = 3.5, 95% CI = 1.3-10.0,  $P_{\text{trend}} = 0.03$ ) or 15-year (OR = 6.2,  
14845 95% CI = 1.8-21.3,  $P_{\text{trend}} = 0.003$ ) exposure lag periods, included only jobs assigned an exposure  
14846 probability with high confidence (OR = 5.1, 95% CI = 1.5-7.2,  $P_{\text{trend}} = 0.12$ ), or excluded participants  
14847 with  $\geq 50\%$  probability of exposure to trichloroethylene (OR = 3.0, 95% CI = 0.99-9.0, 17 cases/  
14848 14 controls,  $P_{\text{trend}} = 0.08$ ), a potential confounder. Results in other newer studies were negative. The  
14849 large case-control study by ([Vlaanderen et al. 2013](#)) derived from the NOCCA cohort found no  
14850 association of kidney cancer with cumulative PCE exposure in men, women, or both sexes combined  
14851 when analyzed by tertiles or when the analysis was restricted to those with high (90<sup>th</sup> percentile)  
14852 exposure (HR = 0.81, 95% CI = 0.65-1.01 based on 88 cases using a cumulative exposure metric; HR =  
14853 1.01, 95% CI = 0.82-1.25 based on 103 cases using a metric of average intensity  $\times$  prevalence). In  
14854 cohort studies, ([Lipworth et al. 2011](#)) found no association between kidney cancer mortality and routine  
14855 or intermittent exposure to PCE in aircraft manufacturing workers (SMR = 0.80, 95% CI = 0.43-1.37, 13  
14856 cases versus 16.3 expected) and no relation to exposure duration among the observed cases, and ([Silver](#)  
14857 [et al. 2014](#)) found no association between kidney cancer and cumulative PCE exposure among  
14858 electronics workers (HR = 0.15, 95% CI = 0.01-4.04). ([Bove et al. 2014a](#)) and ([Bove et al. 2014b](#))



14859 reported nonsignificant elevations in HR for kidney cancer that were, however, unrelated to cumulative  
 14860 PCE exposure in the Camp Lejeune cohort (HR = 1.40, 95% CI = 0.54-3.58, 8 cases; 1.82, 95% CI =  
 14861 0.75-4.42, 11 cases; and 1.59, 95% CI = 0.66-3.86, 11 cases in low, medium, and high groups,  
 14862 respectively). The only other newer study that evaluated this endpoint was not informative due to few  
 14863 observed cases with PCE exposure ([Christensen et al. 2013](#)).  
 14864

14865 A meta-analysis of five selected epidemiologic studies ([Purdue et al. 2017](#); [Silver et al. 2014](#);  
 14866 [Vlaanderen et al. 2013](#); [Dosemeci et al. 1999](#); [Aschengrau et al. 1993](#)) considered to be reliable and  
 14867 informative for the association of kidney cancer and exposure to PCE was performed as part of the  
 14868 current assessment. Applying a fixed-effects model to the five informative studies produced a meta-RR  
 14869 of 0.96 (95% CI = 0.85-1.07) for overall exposure to PCE, with no heterogeneity among studies  
 14870 ( $I^2=0.0\%$ ,  $p=0.72$ ). Estimates of the association of kidney cancer with high exposure to PCE were  
 14871 available for two studies ([Purdue et al. 2017](#); [Vlaanderen et al. 2013](#)). A fixed-effects model based on  
 14872 the association of kidney cancer with high exposure in those two studies and with any exposure in the  
 14873 remaining studies produced a meta-RR of 1.07 (95% CI = 0.89-1.28) with moderate heterogeneity  
 14874 ( $I^2=45.9\%$ ,  $p=0.12$ ). These results are consistent with no association or weak positive association  
 14875 between the occurrence of kidney cancer and exposure to PCE, but should be interpreted with caution  
 14876 due to the small number of informative studies.

### 14877 **F.1.6 Lung**

14878 ([U.S. EPA 2012c](#)) concluded there was limited suggestive evidence for an association between lung  
 14879 cancer risk and PCE exposure. The results from seven large cohort studies of dry cleaners available at  
 14880 that time were consistent with an elevated lung cancer risk of 10–40%. Similar results were observed in  
 14881 four of the five occupational studies that were identified as having a relatively strong exposure  
 14882 assessment methodology, with slightly higher relative risks identified for laundry workers compared  
 14883 with dry cleaning workers in a separate comparison. These studies were unable to control for potential  
 14884 confounding from cigarette smoking, however, and the magnitude of the association in these studies is  
 14885 consistent with that expected assuming the prevalence of smoking among dry cleaners and laundry  
 14886 workers was slightly higher (e.g., 10% higher) than among the general population. Features of the  
 14887 selection of study participants and study analysis in the available case-control studies reduce the  
 14888 potential for confounding by smoking. Two case-control studies were limited to either nonsmokers or  
 14889 ex-smokers and both of these studies indicate an approximate 2-fold increased risk with a history of  
 14890 work in the dry cleaning industry (OR = 1.8, 95% CI = 1.1-3.0; OR = 1.83, 95% CI = 0.98-3.40 among  
 14891 women). The other case-control studies adjusted for smoking history, and the results for these  
 14892 (somewhat smaller studies) are similar to the previously cited estimates. Among the studies that  
 14893 evaluated exposure-response gradients, the evidence for a trend in risk estimates was mixed ([U.S. EPA  
 14894 2012c](#)).  
 14895

14896 Newer case-control studies of lung cancer support a relationship with PCE exposure. A study of lung  
 14897 cancer cases from Montreal that included adjustment for smoking (Comprehensive Smoking Index)  
 14898 reported ORs of 2.5 (95% CI = 1.2-5.6, 23 cases) for “any” exposure to PCE and 2.4 (95% CI = 0.8-7.7,  
 14899 10 cases) for “substantial” exposure ([Vizcaya et al. 2013](#)). A larger study from France that also included  
 14900 adjustment for smoking (Comprehensive Smoking Index) reported ORs of 1.26 (95% CI = 0.87-1.82,  
 14901 107 cases) in men and 2.74 (95% CI = 1.23-6.09, 26 cases) in women ever exposed to PCE ([Mattei et al.  
 14902 2014](#)). In additional analyses by cumulative PCE exposure (split into high and low groups based on  
 14903 median cumulative exposure), ORs for men were 1.14 (95% CI = 0.67-1.94, 45 cases) in the low-dose  
 14904 group and 1.36 (95% CI = 0.84-2.22, 62 cases) in the high-dose group, while ORs for women were 3.80  
 14905 (95% CI = 1.41-10.24, 21 cases) in the low-dose group and 1.43 (95% CI = 0.37-5.50, 5 cases) in the

high-dose group. Further analyses stratified by overlapping exposure to multiple solvents suggested that the observed increase in lung cancer risk was due to PCE, and not co-exposure to other chlorinated solvents (trichloroethylene, methylene chloride, chloroform, carbon tetrachloride). Newer cohort studies that investigated lung cancer risk were negative. (Lipworth et al. 2011) found no association between lung cancer mortality and routine or intermittent exposure to PCE in aircraft manufacturing workers (SMR = 0.94, 95% CI = 0.81-1.07, 206 cases versus 220.3 expected) and no relation to exposure duration among the observed cases. (Bove et al. 2014a) and (Bove et al. 2014b) reported nonsignificant elevations in HR for lung cancer that were, however, unrelated to cumulative PCE exposure in the Camp Lejeune drinking water cohort (HR = 1.33, 95% CI = 0.93-1.90, 56 cases; 1.27, 95% CI = 0.88-1.83, 55 cases; and 1.08, 95% CI = 0.75-1.57, 51 cases in low, medium, and high groups, respectively).

### F.1.7 Liver

(U.S. EPA 2012c) cited results available at that time showing a mixed pattern of results for liver cancer, concluding that there was suggestive but limited evidence of an association. One case-control study with a large number of exposed liver cancer cases and a relatively high-quality exposure assessment methodology reported an OR estimate of 0.76 (95% CI = 0.38-1.72) for liver cancer and dry cleaning. Cohort studies of Nordic subjects with broad exposure assessment approaches reported SIRs of 1.02 (95% CI = 0.84-1.24), 1.22 (95% CI = 1.03-1.45), and 1.23 (95% CI = 1.02-1.49) for liver and biliary tract cancer and work as a dry cleaner or laundry worker. Three other studies with strong exposure assessment approaches specific to PCE, but whose risk estimates are based on fewer observed liver cancer cases or deaths, reported risk estimates of 1.21-2.05 for the association between liver cancer and PCE. However, dry cleaning workers did not have a higher liver cancer risk estimate than laundry workers. Exposure response was not observed, and the SIR for PCE-exposed subjects with the longest employment duration was lower than that for subjects with shorter employment duration. Potential confounding may be an alternative explanation, as no study adjusted for known and suspected risk factors for liver cancer (U.S. EPA 2012c). Nine other cohort and case-control studies with fewer observed events and/or a broad exposure assessment methodology carried less weight in the analysis and reported a mixed pattern of results (U.S. EPA 2012c). One of these reported a risk estimate of 2.57 (95% CI = 1.21-5.46) for the association between liver cancer and residence in a village with groundwater contamination, but subjects were from a region with a high prevalence of hepatitis C infection, and hepatitis C status may confound the observed association.

Among the newer studies, the large case-control study by (Vlaanderen et al. 2013) derived from the NOCCA cohort reported slight nonsignificant increases in liver cancer risk in the second (HR = 1.18, 95% CI = 0.97-1.44, 121 cases) and third (HR = 1.13, 95% CI = 0.92-1.38, 114 cases) tertiles, respectively, of cumulative PCE exposure (both sexes combined), and in those with high (90<sup>th</sup> percentile) PCE exposure (HR = 1.11, 95% CI = 0.79-1.57 based on 40 cases using a cumulative exposure metric; HR = 1.26, 95% CI = 0.88-1.80 based on 38 cases using a metric of average intensity × prevalence). (Lipworth et al. 2011) found no association between liver cancer mortality and routine or intermittent exposure to PCE in aircraft manufacturing workers (SMR = 0.93, 95% CI = 0.56-1.45, 19 cases versus 20.5 expected). There was no significant relationship with exposure duration among the observed cases ( $P_{\text{trend}} > 0.20$ ) in this study, but relative risk was highest in workers with the longest ( $\geq 5$  years) duration of exposure (RR = 1.29, 95% CI = 0.60-2.78, 10 cases). (Silver et al. 2014) found no association between liver cancer and cumulative PCE exposure among electronics workers (HR = 0.79, 95% CI = 0.27-2.30). (Bove et al. 2014a) and (Bove et al. 2014b) reported decreasing HRs of 1.17 (95% CI = 0.55-2.49, 12 cases), 0.96 (95% CI = 0.43-2.14, 10 cases), and 0.82 (95% CI = 0.36-1.89, 9 cases) for liver cancer in low, medium, and high cumulative PCE exposure groups, respectively, in the Camp Lejeune cohort exposed by drinking water. The only other newer study that evaluated this endpoint was

14953 not informative because there was only a single observed case with PCE exposure ([Christensen et al.](#)  
14954 [2013](#)).

#### 14955 **F.1.8 Cervix**

14956 ([U.S. EPA 2012c](#)) included cervical cancer among the tumor types with limited suggestive evidence for  
14957 an association with PCE exposure. The results from two large cohort studies with a broad exposure  
14958 assessment were consistent with an elevated cervical cancer risk of 20-30%: SIR = 1.20 (95% CI = 1.08-  
14959 1.34) and SIR = 1.34 (95% CI = 1.12-1.60). Results from four smaller cohort and case-control studies  
14960 with a relatively high-quality exposure assessment methodology presented a pattern of more variable  
14961 results, with relative risks of 0.98 (95% CI = 0.65-1.47), 1.19 (95% CI = 0.64-1.93), 2.10 (95% CI =  
14962 0.68-4.90), and 3.20 (95% CI = 0.39-11.6). A fourth study with higher quality exposure assessment  
14963 specific to PCE did not observe any cervical cancer deaths among women, but less than one death was  
14964 expected. Only a single study reported an increasing exposure response gradient with employment  
14965 duration. Dry cleaning workers did not have higher cervical cancer risks compared with laundry  
14966 workers. None of the cohort studies of cervical cancer considered socioeconomic or lifestyle factors  
14967 such as smoking or exposure to the human papilloma virus (HPV), a known risk factor for cervical  
14968 cancer that is correlated with socioeconomic status. A case-control study included controls similar in  
14969 socioeconomic status as cases, and the OR estimate in that study for dry cleaners did not support an  
14970 association with PCE ([U.S. EPA 2012c](#)). The only newer study that evaluated this endpoint (([Lipworth](#)  
14971 [et al. 2011](#)), update of ([Boice et al. 1999](#))) was not informative because there was only a single observed  
14972 case with PCE exposure.

#### 14973 **F.1.9 Breast**

14974 Breast cancer was among the endpoints considered by ([U.S. EPA 2012c](#)) to have suggestive but limited  
14975 evidence of an association with PCE exposure based on studies available at that time. Results from the  
14976 large studies of breast cancer risk in women in relation to PCE exposure were mixed. The largest study,  
14977 based on 1,757 breast cancer cases in female dry cleaners and laundry workers, reported a statistically  
14978 significant deficit in the risk of breast cancer incidence compared to the populations of Nordic countries.  
14979 Findings in the other four studies were based on fewer events or exposed cases; two of four studies with  
14980 a nonspecific exposure assessment methodology provided evidence for association between breast  
14981 cancer in females and PCE exposure, but no association to PCE was observed in two other large cohort  
14982 studies with a relatively high-quality exposure assessment methodology ([U.S. EPA 2012c](#)). Small  
14983 studies also observed mixed findings. Although cohort studies were unable to control for potential  
14984 confounding from reproductive history or menopausal status, observations in case-control studies  
14985 controlled for these potential confounders in statistical analyses and provided support for an association  
14986 between female breast cancer and PCE compared to controls. Three studies examined exposure-response  
14987 relationships ([U.S. EPA 2012c](#)), and two of these studies with semiquantitative or quantitative exposure  
14988 assessment approaches reported that risk estimates in females were monotonically increased in higher  
14989 exposure groups. A third study examining exposure duration observed an inverse relation, but exposure  
14990 duration is more uncertain than use of a semiquantitative surrogate given increased potential for bias  
14991 associated with exposure misclassification.

14992  
14993 Few data on breast cancer were found in newer studies. ([Gallagher et al. 2011](#)) conducted a case-control  
14994 study that included an updated exposure assessment and reanalysis of breast cancer data previously  
14995 evaluated by ([Aschengrau et al. 2003](#)), ([Aschengrau et al. 1998](#)), and ([Paulu et al. 1999](#)). They found no  
14996 increase in breast cancer risk for women “ever” exposed to PCE versus unexposed, but modest  
14997 nonsignificant risk increases in women with high cumulative exposure defined as 90<sup>th</sup> percentile (ORs  
14998 mostly 1.3-1.5 depending on latency) or as a higher cut point identified by curve smoothing analysis  
14999 (ORs 1.3-1.4 with 0-7-year latency and 1.6-2.0 with 9-15-year latency). In the ([Lipworth et al. 2011](#))

15000 update of the (Boice et al. 1999) cohort of aircraft manufacturing workers, there was also a  
15001 nonsignificant increase in breast cancer risk (SMR = 1.52, 95% CI = 0.78-2.65) based on only 12 cases  
15002 (versus 7.9 expected), but no significant trend based on exposure duration ( $P_{\text{trend}} > 0.20$ ) in an analysis  
15003 limited by the small number of cases per exposure duration category. The only other newer study that  
15004 evaluated this endpoint was not informative due to few observed cases with PCE exposure (Bove et al.  
15005 2014a, b).

15006  
15007 Because of the limitation in statistical power, none of the older (U.S. EPA 2012c) or newer (Ruckart et  
15008 al. 2015) studies reporting on male breast cancer was adequate to examine PCE exposure.

#### 15009 **F.1.10 Other**

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15010 No other cancers were identified by (U.S. EPA 2012c) as having potential associations with PCE  
15011 exposure. Among the newer studies, case-control studies by (Barul et al. 2017), (Carton et al. 2017) and  
15012 (Christensen et al. 2013) presented results suggesting potential associations between PCE exposure and  
15013 prostate cancer in men and pharyngeal/laryngeal cancers in both sexes. However, these findings were  
15014 based on small numbers of cases ( $\leq 10$ ) and so are highly uncertain. Other studies did not report  
15015 supporting results. (Lipworth et al. 2011) found no increase in risk of death due to cancers of the buccal  
15016 cavity and pharynx (SMR = 0.77, 95% CI = 0.41-1.32, 13 observed and 16.8 expected), larynx (SMR =  
15017 0.90, 95% CI = 0.36-1.84, 7 observed and 7.8 expected), or prostate (SMR = 0.92, 95% CI = 0.72-1.16,  
15018 71 observed and 77.1 expected) in their cohort of aircraft manufacturing workers exposed to PCE. No  
15019 significant relationship between cumulative exposure to PCE and risk of prostate or oral cancers was  
15020 evident in the Camp Lejeune cohort (Bove et al. 2014a, b).

#### 15021 **F.1.11 Detailed Summary Epidemiologic Evidence on Cancer Published after the 2012** 15022 **IRIS Toxicological Assessment on PCE**

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15023 Lipworth et al. (2011) conducted a follow-up analysis of the aircraft manufacturing worker cohort  
15024 originally evaluated by (Boice et al. 1999) and described in (U.S. EPA 2012c). The cohort consisted of  
15025 77,943 employees who had worked for at least 1 year at a Lockheed Martin manufacturing facility in  
15026 California on or after January 1, 1960. The cohort included both exposed factory workers (n=45,318)  
15027 and unexposed non-factory workers (n=32,625). Subjects were identified using employee work history  
15028 records, personnel files, and retirement records. Deaths through December 31, 2008 (n=34,298) were  
15029 determined using the California Death Statistical Master File (CDSMF), National Death Index (NDI),  
15030 and Social Security Administration Death Master File (SSADM), as well as company pension records  
15031 and a commercial service specializing in death record location. Workers for whom no death records  
15032 were identified were traced using Social Security Administration Service to Epidemiologic Researchers  
15033 and LexisNexis records to confirm that they were alive; these methods confirmed the identification of  
15034 42,309 living workers. The vital status of the remaining 1,336 workers (1.7% of cohort) was not  
15035 determined. For deaths after 1978, underlying cause of death was available in the NDI; the CDSMF  
15036 provided cause of death for subjects who died in California, and death certificates were obtained for the  
15037 remaining subjects (and for a small number of subjects whose records in NDI were incomplete).

15038  
15039 Exposures were determined based on historical job descriptions, chemical usage patterns, environmental  
15040 assessment reports, industrial hygiene records, interviews with long-term workers, and walk-throughs of  
15041 aircraft manufacturing facilities; details of the exposure assessment were published by (Marano et al.  
15042 2000). Approximately 12.9% of factory workers (n=5,830) had some exposure to PCE. According to  
15043 (Marano et al. 2000), many PCE-exposed workers also had exposure to chromate (76%),  
15044 trichloroethylene (39%), mixed solvents (56%), and/or asbestos (5%). Relative exposure to each worker  
15045 was assigned based on length of time in specific jobs with potential for exposure to each substance.  
15046 (Marano et al. 2000) indicated that exposures were categorized as either routine or intermittent, and that

15047 approximately 55% of the PCE-exposed workers were classified as having intermittent exposure. Thus,  
15048 there may have been a wide range of cumulative exposure levels in the group exposed to PCE, which  
15049 could bias the analysis toward the null. No information was available to the researchers regarding  
15050 smoking, alcohol consumption, or other lifestyle factors.

15051  
15052 For standard mortality ratio (SMR) calculations, expected numbers of deaths were obtained using age,  
15053 race, calendar year, and sex-specific rates from California (for white workers) or the U.S. general  
15054 population (for non-white workers, to better match the racial composition of the worker population)  
15055 ([Lipworth et al. 2011](#)). For internal analyses examining the influence of exposure duration, the  
15056 comparison group consisted of factory workers without exposure to solvents or chromates (n=9,520).  
15057 The model included date of birth, date of hire, date of termination, sex, and race. There was no explicit  
15058 consideration of latency.

15059  
15060 There were 2,641 deaths among the workers exposed to PCE ([Lipworth et al. 2011](#)). SMRs for all causes  
15061 of death and all malignant neoplasms were reduced slightly (0.93 and 0.96, respectively), consistent with  
15062 a healthy worker effect. A marginally significant increase in the SMR for NHL (SMR = 1.43; 95%  
15063 confidence interval [CI] = 1.00-1.98; n=36 cases) was observed. Nonsignificant increases in SMRs for  
15064 cancers of the breast (SMR = 1.52, 95% CI = 0.78-2.65, n=12 cases), connective and other soft tissues  
15065 (SMR = 1.58; 95% CI = 0.58-3.43; n=6 cases), ovary and other female genital (SMR = 1.28, 95% CI =  
15066 0.26-3.74; n=3 cases), and testes and other male genital (SMR = 2.18, 95% CI = 0.45-6.37; n=3 cases)  
15067 were based on small numbers of cases. Other sites, including bladder, kidney, liver, lung, esophagus,  
15068 and cervix and MM had SMRs below or close to 1.0 (SMR  $\leq$  1.13).

15069  
15070 Analyses based on duration of exposure (<1, 1-4,  $\geq$ 5 years) to PCE did not support an association  
15071 between PCE and NHL or any other tumor type examined, including MM and cancers of the breast,  
15072 kidney, liver, lung, or esophagus ([Lipworth et al. 2011](#)). For NHL, relative risks were 1.26 (95% CI =  
15073 0.65-2.45, 11 observed), 1.00 (95% CI = 0.05 2.00, 10 observed), and 1.02 (95% CI = 0.53-1.99, 12  
15074 observed) in the low- to high-duration exposure groups compared with unexposed factory workers  
15075 (Ptrend >0.2). Interpretation of the duration of exposure analysis was limited for most other tumor types  
15076 (all of those listed above, except lung) by small numbers of observed tumors ( $\leq$ 4) in one or more of the  
15077 duration groups.

15078  
15079 In another cohort study, ([Silver et al. 2014](#)) evaluated the association between PCE exposure and cancer  
15080 mortality in a cohort of 34,494 microelectronics workers in New York state. The workers were engaged  
15081 in business machine production and manufacture of circuit boards and substrates between 1906 and  
15082 2001. Machine production involved exposure to dust, solvents, and metals, while circuit board  
15083 production involved exposure to chlorinated solvents and other industrial chemicals. Facility records  
15084 indicated that use of trichloroethylene in circuit board production began in the mid-1960s, and that use  
15085 of PCE increased in 1974 when substrate manufacturing began.

15086  
15087 Members of the cohort included all direct employees who had worked at least 91 days between January  
15088 1, 1969 and December 31, 2001 and were U.S. citizens ([Silver et al. 2014](#)). The Social Security  
15089 Administration, NDI, and Internal Revenue Service were used to determine vital status of cohort  
15090 members through December 31, 2009. Cause of death was determined from the NDI for deaths after  
15091 1979 and from death certificates for earlier deaths and coded according to the International  
15092 Classification of Diseases (ICD) revision in effect at the time of death.

15093 Higher percentages of hourly than salaried workers were ever potentially exposed to a compound  
15094 considered in the study; however, even among hourly workers, the prevalence of PCE exposure was low

15095 ([Silver et al. 2014](#)). Among male hourly workers, 15.1% were exposed to PCE, compared with 60.5%  
15096 exposed to “other hydrocarbons.” Chemical exposure was estimated using work histories from  
15097 electronic personnel databases, chemical use and exposure information from the company, industrial  
15098 hygiene monitoring results/documents, and company environmental impact assessments, as well as  
15099 interviews of former employees and results from an Agency for Toxic Substances and Disease Registry  
15100 (ATSDR) study of volatile organic compound (VOC) use at the plant from 1969 to 1980. An exposure  
15101 database linking chemical use with department and year was developed and used to assign each subject  
15102 to an exposed/unexposed category for PCE, trichloroethylene, methylene chloride, and chlorinated  
15103 hydrocarbons as a class. Cumulative exposure duration was modified by a parameter categorizing the  
15104 extent of chemical use in a department and another that categorized the extent of exposure by job  
15105 function.

15106  
15107 SMRs were calculated for all cohort members, but these analyses were not chemical-specific ([Silver et](#)  
15108 [al. 2014](#)). Internal analyses by chemical exposure were performed using conditional logistic regression  
15109 based on full risk sets (equivalent to Cox proportional hazards analysis). In these analyses, chemical  
15110 exposure of cases was compared with those of “controls”: workers who began at an age younger than  
15111 the cases and survived longer (these could include cases from other risk sets). Age was controlled using  
15112 risk set selection, and models were adjusted for sex and pay code (as it is potentially associated with  
15113 exposure, smoking, and other potential confounders). Smoking, alcohol consumption, and other lifestyle  
15114 factors were not explicitly considered. The authors did not control for other chemical exposures or  
15115 evaluate correlations among them. Hazard ratios (HRs) at 5 modified exposure years were reported,  
15116 along with the regression coefficient, with a 10-year lag time incorporated for all outcomes apart from  
15117 leukemia (for which a 2-year lag was used).

15118  
15119 SMRs for all cause and all cancer mortality were significantly decreased in the cohort relative to U.S.  
15120 general population rates, showing the expected healthy worker effect ([Silver et al. 2014](#)). Also among  
15121 the cohort as a whole, the SMR for NHL was significantly increased in hourly male workers (SMR =  
15122 1.49, 95% CI = 1.15-1.89, 65 observed). In the analyses for specific chemical exposures, PCE showed a  
15123 small nonsignificant increase in HR for NHL (HR = 1.25, 95% CI = 0.90-1.73), while the other  
15124 exposures examined (trichloroethylene, methylene chloride, chlorinated hydrocarbons, and other  
15125 hydrocarbons) showed nonsignificant decreases. PCE showed no association (HR  $\leq$ 1.0) with other  
15126 cancers, including bladder, kidney, liver, brain, or MM. The study was limited by the young age of the  
15127 cohort (only 17% had died at the end of follow-up), as well as by the low prevalence of PCE exposure  
15128 and failure to control for co-exposures.

15129  
15130 ([Gallagher et al. 2011](#)) performed a case-control study that included a reanalysis of breast cancer data  
15131 previously evaluated by ([Aschengrau et al. 1998](#)), ([Aschengrau et al. 2003](#)), and ([Paulu et al. 1999](#)) and  
15132 described in ([U.S. EPA 2012c](#)), updating the exposure assessment of the Cape Cod population exposed  
15133 to PCE leaching from the vinyl lining of drinking water distribution pipes. Briefly, while earlier  
15134 assessments used the Webler and Brown model to estimate residential PCE exposures based on the  
15135 configuration, size, age, and water flow rate in contaminated pipe serving each residence, ([Gallagher et](#)  
15136 [al. 2011](#)) employed the EPANET software to provide more robust modeling of water flow throughout  
15137 the entire distribution system. Participant selection was identical to earlier assessments, except that  
15138 subjects from the earlier analyses were excluded if information needed for EPANET modeling was  
15139 missing. Eligible persons consisted of permanent female residents of eight affected towns in Cape Cod.  
15140 Incident breast cancer cases between 1983 and 1993 were identified using the state cancer registry;  
15141 controls of comparable age and vital status were identified through random digit dialing (for controls up  
15142 to 64 years of age), Medicare records (65 years of age and older), or death certificates (deceased

controls). Of 1,192 cases and 7,869 controls initially identified, 87 cases and 1,125 controls could not be located; 31 cases and 4,404 controls were not eligible based on residential criteria; 8 cases and 34 controls lacked exposure information; and 136 cases and 338 controls declined to participate (or their physicians declined consent). Finally, 666 eligible controls identified by random digit dialing were excluded because the target number of controls had already been reached. Of the 930 cases and 1,302 controls included in previous analyses, 19 lacked information needed for EPANET exposure modeling and were excluded, leaving 920 cases and 1,293 controls for the reanalysis.

From each subject, detailed residential history, history of occupational exposure to PCE, risk factors for breast cancer, and other demographic information was obtained via interview ([Gallagher et al. 2011](#)). Using the EPANET software to model water flow in the distribution system and leaching components from the Webler-Brown model, the study authors estimated relative delivered dose (RDD) to each residence. The RDD is a relative dose estimate intended to approximate the amount of PCE delivered to each residence. Odds ratios (ORs) were evaluated using multiple logistic regression controlling for the following variables: age at diagnosis or index year, vital status at interview, family history of breast cancer, personal history of prior breast cancer, age at first live birth or stillbirth, occupational PCE exposure, and study of origin (first study or second expanded study). Use of bottled water was considered by stratifying the results. Other potential confounders, including education, hormone use, and parity were considered, but did not modify effect estimates by at least 10% and were excluded from the final model. ORs were calculated with and without latency periods of 5-19 years, based on ever/never exposed, cumulative RDD, peak RDD, and duration of exposure to PCE. The impact of PCE leaching rate was evaluated by sensitivity analysis, and smoothing analysis was used to refine the cut points for high exposure.

The updated exposure assessment using the EPANET software categorized larger percentages of cases and controls as exposed (48.8% and 50.1%, respectively) compared to the earlier method (20.5% and 16.7%, respectively), which had assumed that residences not in close proximity to a source pipe were not exposed ([Gallagher et al. 2011](#)). Because most of the participants whose status shifted from non-exposed to exposed were exposed at low levels, the EPANET method yielded a downward shift in RDD distribution percentiles compared to the earlier method; for example, 75th and 90th percentile RDD estimates (unitless) with no latency period were 7.1 and 19.5, compared with 15.5 and 41.8 (respectively) using the earlier method.

Using the updated exposure estimates, no increases in the adjusted ORs for breast cancer were observed for women “ever” versus never exposed, regardless of latency period considered (adjusted OR = 1.0 for all latencies) ([Gallagher et al. 2011](#)). Compared to unexposed subjects, modest nonsignificant increases in the adjusted ORs were observed for cumulative RDDs above the 90th percentile (adjusted ORs mostly 1.3-1.5 depending on latency) and for peak RDD above the 90th percentile (adjusted ORs 0.9-1.5), but not the lower exposure levels. Analysis for duration of exposure showed a nonsignificant increase in breast cancer risk in women with more than 10 years of exposure when a 13-year latency period was included (adjusted OR = 1.8, 95% CI = 0.7-4.4); none of the women had more than 10 years of exposure when longer latency periods were considered. No associations were found between shorter durations of exposure and breast cancer, regardless of latency period. When the cut points for higher cumulative exposure were redefined based on smoothing analysis (RDD >35), adjusted ORs (none significant) were 1.3-1.4 with 0-7-year latency and 1.6-2.0 with 9-15-year latency. Results were reported to be similar for peak exposure, but data were not shown. Finally, slightly higher risks were seen for exposed women who did not drink bottled water regularly (adjusted ORs = 1.1 1.3 across latency periods) when compared with those who did (adjusted ORs = 0.6-0.8). As in the previous studies

15191 conducted on these data, this study suggests a modest association between high drinking water exposure  
15192 to PCE and breast cancer risk in women.

15193  
15194 ([Ruckart et al. 2013](#)) conducted a case-control study of childhood hemopoietic cancers (leukemia and  
15195 NHL) in children exposed prenatally and in early childhood to contaminated drinking water at the  
15196 Marine Corps Base at Camp Lejeune, North Carolina. Contaminated water at the camp, which opened in  
15197 the 1940s, was discovered in the early 1980s in wells of the Camp's Hadnot Point and Tarawa Terrace  
15198 distribution systems. The Tarawa Terrace system was primarily contaminated with PCE (up to 215  
15199  $\mu\text{g/L}$ ) from a nearby dry cleaner, while Hadnot Point was primarily contaminated with trichloroethylene  
15200 (up to 1,400  $\mu\text{g/L}$ ), with lesser amounts of vinyl chloride, 1,2-dichloroethylene, PCE, and benzene. These  
15201 authors did not detail other contaminants in the Tarawa Terrace system; however, ([Ruckart et al. 2015](#))  
15202 estimated that low levels ( $\leq 20 \mu\text{g/L}$ ) of dichloroethylene, trichloroethylene, and vinyl chloride were  
15203 present along with PCE.

15204  
15205 The study population consisted of children born alive between 1968, when North Carolina began  
15206 computerizing birth certificates, and 1985, when the contaminated wells were closed, and whose  
15207 mothers had lived at Camp Lejeune during pregnancy ([Ruckart et al. 2013](#)). A total of 12,493 children  
15208 whose mothers lived on base when they delivered were identified by birth certificates, and an additional  
15209 4,000 children whose mothers had moved off base prior to delivery were identified via media campaigns  
15210 and referrals from enrolled subjects. Telephone interviews of parents were conducted by ATSDR to  
15211 obtain information on childhood (before age 20) leukemia and NHL and residential histories. Of 12,498  
15212 subjects whose parents were contacted, 76% agreed to participate, including 10,044 identified by birth  
15213 certificates and 2,554 identified by referral.

15214  
15215 Exposures to contaminated water were estimated by ATSDR via base-wide models of groundwater fate  
15216 and transport and drinking water distribution systems, which yielded monthly average concentration  
15217 estimates at each residence ([Ruckart et al. 2013](#)). Base housing records and parental interview  
15218 information were combined with the concentrations to estimate average exposure to each subject across  
15219 pregnancy and the first year of life. The study authors did not isolate subjects by water distribution  
15220 system, so the study population included those using the Hadnot Point system with exposure primarily to  
15221 trichloroethylene. Exposures were estimated for each trimester, for the whole gestation period, and for  
15222 the first year of life.

15223  
15224 A total of 14 childhood hematopoietic cancers were reported by parents ([Ruckart et al. 2013](#)). Of these,  
15225 13 cases were confirmed via vital and medical records, including 11 leukemias and 2 NHL. The parents  
15226 of 651 potential control subjects were contacted; 103 refused or could not be contacted, so 548 were  
15227 interviewed. Subsequently, 14 control children were excluded because their parents reported in the  
15228 interview that the mother had not resided on the base during pregnancy; 6 were excluded because the  
15229 parents were interviewed about the wrong child; and two lacked residential history during pregnancy,  
15230 leaving 526 controls. ORs were estimated using unconditional logistic regression. Potential confounders  
15231 considered in the analysis were not reported, and adjusted results were only reported if the difference  
15232 from the crude estimates was more than 20%.

15233  
15234 The median estimated average PCE exposure of subjects was 44  $\mu\text{g/L}$  ([Ruckart et al. 2013](#)). Using the  
15235 average first trimester exposure estimate, the unadjusted OR for exposed versus unexposed was 1.6  
15236 (95% CI = 0.5-4.8) based on 7 cases (total for childhood leukemia and NHL combined), and the  
15237 unadjusted ORs for exposure above and below the median, compared with unexposed, were similar and  
15238 also imprecise (OR = 1.4, 95% CI 0.3-5.6 for exposure  $\geq 44 \mu\text{g/L}$  based on 3 cases; OR=1.8, 95% CI =



15239 0.5-6.6 for exposure >0 and <44 µg/L based on 4 cases). Other metrics for first trimester exposure  
15240 (maximum, unexposed including exposure <1 µg/L) yielded comparable effect estimates (data not  
15241 reported), while no association with childhood leukemia and NHL was seen using cumulative exposure  
15242 to PCE through pregnancy or the first year of life (data not reported). These data are highly uncertain  
15243 due to the small number of observed cases exposed to PCE.  
15244

15245 ([Ruckart et al. 2015](#)) assessed male breast cancer risk in a case-control study of U.S. Marine Corps  
15246 personnel stationed at Camp Lejeune. Cases and controls were identified using the Veteran's Affairs  
15247 Central Cancer Registry (VACCR). The study population was defined as male Marines diagnosed or  
15248 treated for cancers between January 1, 1995 (when the VACCR began) and May 5, 2013 at a medical  
15249 facility run by the Veterans Administration (VA). Those who were not old enough to have been at Camp  
15250 Lejeune during the time of water contamination (e.g., at least 17 years old by December 31, 1985) were  
15251 excluded. A total of 78 incident cases of male breast cancer were identified. Controls were diagnosed  
15252 with cancers not known to be related to solvent exposure, including non-melanoma skin cancer, bone  
15253 cancer, and pleural or peritoneal mesothelioma. To achieve the targeted 5 controls per case, the study  
15254 authors included all 32 bone cancer cases, all 76 mesothelioma cases, and a random sample of 292 skin  
15255 cancers from among the 555 identified in VACCR, yielding a total of 400 controls.  
15256

15257 All information was obtained from databases; no subject interviews were conducted ([Ruckart et al.](#)  
15258 [2015](#)). Military personnel records were used to determine whether and when subjects had been stationed  
15259 at Camp Lejeune before 1986, as well as their marital status at each time period stationed there; these  
15260 records were missing for 7 cases and 27 controls. The VACCR and VA patient treatment files were  
15261 examined for information on tumor histological confirmation, date of birth, age at diagnosis, race, and  
15262 medical conditions (e.g., diabetes, obesity, gynecomastia, and Klinefelter syndrome) potentially related  
15263 to male breast cancer development. Finally, information on service in Vietnam (with potential exposure  
15264 to dioxin via Agent Orange) and military occupational specialties with potential exposure to solvents  
15265 and electromagnetic fields was obtained from military personnel records.  
15266

15267 The same historical reconstruction method used by ([Ruckart et al. 2013](#)) was used to estimate monthly  
15268 average exposure concentrations at each residence ([Ruckart et al. 2015](#)). The residential histories of  
15269 cases and controls were developed from base housing records, military personnel records, and unit-  
15270 specific housing records. Exposure began with the earliest time each subject was stationed at Lejeune  
15271 and ended either when his tour ended or on December 31, 1985. Cumulative and average exposures  
15272 were estimated for each subject; exposure-response analysis was performed by categorizing exposures  
15273 above and below the median. The study authors employed exact logistic and conditional regression  
15274 methods to estimate associations, but since results were similar, only the exact logistic method results  
15275 were presented. Results were adjusted for age at diagnosis, race, and service in Vietnam; other potential  
15276 covariates (case/control status, ethnicity, rank, diabetes, or gynecomastia) did not alter risk estimates by  
15277 at least 10%. Finally, proportional hazards analysis, adjusted for race and service in Vietnam, was used  
15278 to assess whether PCE exposure resulted in earlier age at breast cancer diagnosis. While latency was not  
15279 explicitly included in the assessment, the authors noted that an implicit latency of at least 10 years was  
15280 considered, because exposures ended in 1985, and cases were diagnosed after 1995 (when the VACCR  
15281 commenced operation).  
15282

15283 The final analysis included 71 cases and 373 controls, but only 4 cases exposed to PCE ([Ruckart et al.](#)  
15284 [2015](#)). For cumulative PCE exposure, the adjusted ORs for low (>0 and <36 µg/L-months) and high  
15285 (≥36 µg/L-months) exposure were 1.05 (95% CI = 0.14-5.14) and 1.20 (95% CI = 0.16-5.89),  
15286 respectively. For monthly average exposure, the adjusted ORs for low (>0 and <2 µg/L) and high (≥2

15287 µg/L) exposure were 0.91 (95% CI = 0.13-4.21) and 1.47 (95% CI = 0.18-7.91). In the evaluation for  
15288 reduced age at diagnosis, the adjusted HRs were 1.19 (95% CI = 0.2-7.07) for low and 2.08 (95% CI =  
15289 0.31 14.00) for high cumulative exposures. All of these results are highly uncertain, as they are based on  
15290 only 2 cases per exposure group.

15291  
15292 A retrospective cohort study of military personnel at Camp Lejeune was conducted by ([Bove et al.](#)  
15293 [2014a](#)) and ([Bove et al. 2014b](#)). A primary focus of the study was standardized mortality analysis of  
15294 personnel stationed at Camp Lejeune (with exposure to drinking water contaminated with PCE,  
15295 trichloroethylene, and other solvents) and analyses comparing personnel at Camp Lejeune with those  
15296 stationed at Camp Pendleton (without exposure to contaminated water); these analyses are not discussed  
15297 here, because they do not provide hazard identification information specific to PCE. The study authors  
15298 also conducted an internal analysis of Camp Lejeune with chemical-specific effect estimates, as  
15299 described here.

15300  
15301 The study population was defined as all Marine and Navy personnel who were stationed for active duty  
15302 at Camp Lejeune between April 1975 and December 1985 ([Bove et al. 2014a, b](#)). A total of 154,932  
15303 subjects were identified using personnel files that included date of birth, sex, race/ethnicity, marital  
15304 status, rank, active duty start date, total months of service, and military occupation. Vital status was  
15305 determined using Social Security Administration data and a commercial tracing service, and deaths and  
15306 causes (underlying and contributing) were identified using the NDI. Subjects whose vital status could  
15307 not be determined contributed person-years until the last date known to be alive.

15308  
15309 Exposure assessment employed the same historical reconstruction methods used by ([Ruckart et al. 2015](#))  
15310 and ([Ruckart et al. 2013](#)). Residential histories were determined using base housing records together  
15311 with rank, gender, marital status, and dates of service. For each subject, monthly average exposure  
15312 concentrations at each residence were combined with duration at each residence to estimate cumulative  
15313 exposure. Exposure estimates for PCE exhibited correlations (0.44-0.53) with other contaminants; the  
15314 authors noted that the Tarawa Terrace system, with the highest PCE levels (up to 158 µg/L, with mean  
15315 monthly average estimate of 75.7 µg/L), had low levels of other contaminants (e.g., mean estimated  
15316 monthly averages of 3.1 µg/L trichloroethylene and 5.6 µg/L vinyl chloride). The other contaminated  
15317 system at the Camp, Hadnot Point, was primarily contaminated with trichloroethylene (mean monthly  
15318 average estimate of 358.7 µg/L; means for PCE, vinyl chloride, and benzene were 15.7, 24.0, and 5.4  
15319 µg/L, respectively).

15320  
15321 The study authors analyzed the association between cancer mortality and PCE exposure as HRs using  
15322 Cox extended regression models with age as the time variable and cumulative exposure as a time-  
15323 varying variable ([Bove et al. 2014a, b](#)). Lag periods of 0, 10, 15, and 20 years were considered in  
15324 assessments of cumulative exposures. Confounders were incorporated into the model if they altered the  
15325 effect estimate by 10% or more; these included sex, race, rank, and education. Because the data sources  
15326 used for the study lacked information on smoking, the HR for smoking-related diseases (stomach cancer,  
15327 cardiovascular disease, chronic obstructive pulmonary disease [COPD]) were subtracted from the HR  
15328 for the disease of interest to assess potential confounding by smoking. The validity of this method to  
15329 control for confounding by smoking is uncertain. No information on alcohol consumption or non-  
15330 service-related occupational exposures was available in the data sources used in the study.

15331  
15332 The analysis based on cumulative exposure to PCE showed no significant exposure-related increase in  
15333 cancer risk for any tumor type, including bladder, kidney, liver, esophagus, breast, brain, lung, MM,  
15334 NHL, Hodgkin's disease, and leukemia ([Bove et al. 2014a, b](#)). Nonsignificant Increases in kidney cancer

15335 risk were observed for all cumulative exposure levels of PCE, but risk did not increase with estimated  
15336 exposure: HRs were 1.40 (95% CI = 0.54-3.58, 8 cases), 1.82 (95% CI = 0.75-4.42, 11 cases), and 1.59  
15337 (95% CI = 0.66-3.86, 11 cases) for low (>1 to 155 µg/L-month), medium (>155-380 µg/L-month), and  
15338 high (>380 8,585 µg/L-month) exposures, respectively. The authors reported that similar results were  
15339 observed when exposure was quantified as average exposure or duration of exposure (data not shown).  
15340 Findings from this study should be considered preliminary, as fewer than 6% of the cohort had died by  
15341 the end of the study, with 97% remaining under the age of 55 years.

15342  
15343 ([Christensen et al. 2013](#)) performed a case-control study to examine the relationship between  
15344 occupational solvent exposure and multiple cancer types in residents of Montreal, Canada. Among 4,576  
15345 eligible Canadian males aged 35-70 years diagnosed with any of 11 different types of cancer (bladder,  
15346 NHL, liver, pancreas, kidney, esophagus, stomach, colon, rectum, prostate, melanoma) between 1979  
15347 and 1985 in the 18 largest hospitals in Montreal, 3,730 (82%) were successfully interviewed (proportion  
15348 by proxy varied with tumor type from low of 11.6% for melanoma to high of 60.4% for liver cancer).  
15349 Population controls, stratified by sex and age to the distribution of cases, were randomly sampled from  
15350 electoral lists; 533 (72%) of 740 eligible controls were interviewed (12.6% by proxy). Interviews were  
15351 conducted to obtain information on lifestyle factors and job history (company, products, nature of work  
15352 site, subject's main and secondary tasks, use of protective equipment, etc.), which was translated into  
15353 potential exposures to chlorinated solvents (PCE and 5 other individual chemicals, chlorinated alkanes,  
15354 chlorinated alkenes) by a team of chemists and industrial hygienists, blinded to a subject's case or  
15355 control status. Exposures were graded with respect to confidence that the exposure had occurred  
15356 (possible, probable, definite), frequency of exposure in a normal work week (<5%, 5-30%, >30% of the  
15357 time), and intensity of exposure (low, medium, or high). Exposures that were probable or definite, with  
15358 frequency and intensity of medium or high and duration of 5 or more years were considered to be  
15359 "substantial" for the analysis.

15360  
15361 The authors did not discuss the extent of overlap of exposures ([Christensen et al. 2013](#)), but review of  
15362 the occupations with highest prevalence of exposure for each material analyzed showed considerable  
15363 overlap in occupations that is likely to have extended to exposures as well. Analyses were performed  
15364 using both population and cancer controls, as well as a pooled control group with cancer controls given  
15365 equal weight to population controls. Cancer controls for a given tumor type were cancer cases with other  
15366 tumors that were: (1) not lung cancer, (2) not from adjacent sites in the body to the site in question, and  
15367 (3) selected so that no more than 20% were from any one cancer site. All models were adjusted for age,  
15368 ethnicity (French Canadian or other), socioeconomic status, and respondent (proxy or self). Models for  
15369 some cancer types (not NHL) were also adjusted for smoking and consumption of alcohol, coffee,  
15370 and/or tea. Models were not adjusted for co-exposures to other solvents. Most cases and controls were  
15371 current or former smokers.

15372  
15373 Numbers of cases and population controls with "substantial" or even "any" exposure to PCE were low  
15374 for all tumor types, 4 or lower in most cases ([Christensen et al. 2013](#)), which limits the conclusions that  
15375 can be drawn based on reported ORs for most endpoints in this study, whether above or below 1.0.  
15376 However, a significant increase was found for risk of prostate cancer with "substantial" exposure to PCE  
15377 relative to both population controls (OR = 6.0, 95% CI = 1.2-30 based on 9/449 cases and 2/533  
15378 controls) and cancer controls (OR = 4.3, 95% CI = 1.4-13 based on 9/1,550 controls). None of the other  
15379 chemicals evaluated showed a significant association with prostate cancer, and neither did chlorinated  
15380 alkenes or alkanes collectively. Confidence in the suggested association between PCE exposure and  
15381 prostate cancer is low due to small numbers of cases and controls.

15383 ([Vizcaya et al. 2013](#)) published separate and pooled analyses of lung cancer from two population-based  
15384 case-control studies performed in Montreal, Quebec. Analyses of non-pulmonary cancer types in one of  
15385 the case-control studies (referred to as Study I) were published by ([Christensen et al. 2013](#)); details of  
15386 the case and control selection, participation rates, and exposure assessment for Study I are discussed in  
15387 that study description. Study II was conducted using nearly identical procedures but from 1995 to 2001  
15388 (Study I was 1980-1986). A total of 851 male lung cancer cases and 533 male controls (79% and 70% of  
15389 eligible subjects, respectively) were identified in Study I, while 735 male and 430 female lung cancer  
15390 cases and 898 male and 570 female controls (86% and 70% of eligible subjects, respectively) were  
15391 identified in Study II. Next-of-kin proxies responded for about one-third of cases and one-tenth of  
15392 controls. ORs were calculated using unconditional logistic regressions adjusted for age, income,  
15393 ethnicity, educational attainment, questionnaire respondent (self versus proxy), tobacco smoking  
15394 (Comprehensive Smoking Index), exposure to occupational lung carcinogens (never, ever, or substantial  
15395 occupational exposure to any of the 8 known or probable International Agency for Research on Cancer  
15396 (IARC) lung carcinogens: asbestos, crystalline silica, chromium VI, arsenic compounds, diesel exhaust  
15397 emissions, soot, wood dust, or benzo[a]pyrene), and in the pooled analysis, study (I versus II). The  
15398 authors noted that sample sizes were limited and there was overlapping exposure to multiple solvents,  
15399 and thus it was not possible to evaluate risks to subjects exposed to only one solvent.

15400  
15401 Prevalence of exposure to any chlorinated solvent was 14.4% in male and 9.6% in female population  
15402 controls across both studies ([Vizcaya et al. 2013](#)). Because there were fewer women included and their  
15403 exposure prevalence was lower, the study had little power to detect an effect in women and results were  
15404 presented for men only. The lifetime prevalence of PCE exposure in controls was very low (0.9% across  
15405 both studies). ORs for lung cancer with PCE exposure were 4.3 (95% CI = 1.1-16) based on 11/667  
15406 cases and 4/403 controls with “any” exposure and 5.7 (95% CI = 0.9-36) based on 6/667 cases and 2/403  
15407 controls with “substantial” exposure in Study I, 2.3 (95% CI = 0.8-6.2) based on 12/646 cases and 9/822  
15408 controls with “any” exposure and 1.6 (95% CI = 0.3-8.3) based on 4/646 cases and 4/822 controls with  
15409 “substantial” exposure in Study II, and 2.5 (95% CI = 1.2-5.6) based on 23/1,313 cases and 13/1,225  
15410 controls with “any” exposure and 2.4 (95% CI = 0.8-7.7) based on 10/1,313 cases and 6/1,225 controls  
15411 with “substantial” exposure in the pooled analysis. Similar results were observed when the analysis was  
15412 restricted to subjects who completed the questionnaires themselves (no proxy respondents). Among the  
15413 other chemicals evaluated, only carbon tetrachloride showed a significant association with lung cancer,  
15414 with results comparable to those for PCE among those with “substantial” exposure. There was no  
15415 association with lung cancer for chlorinated alkenes or alkanes collectively. These findings suggest an  
15416 association between exposure to PCE and lung cancer, but are limited by the low numbers of cases and  
15417 controls with PCE exposure.

15418  
15419 ([Mattei et al. 2014](#)) performed a large, multicenter population-based case-control study of lung cancer  
15420 and solvent exposure in France. Cases were recruited from health care providers associated with French  
15421 cancer registries. A total of 4,865 eligible cases (ages 18-75 years) of incident, histologically-confirmed  
15422 lung cancer were identified between 2001 and 2007; of these, 3,357 living subjects were located and  
15423 healthy enough to be interviewed, and 2,926 (87%) were willing to participate. Controls were selected  
15424 by incidence density sampling and frequency-matched by age and gender. Investigators were able to  
15425 contact 4,411 (94%) of 4,673 eligible controls and 3,555 (81%) agreed to participate. Analyses were  
15426 based on 2,274 male and 622 female cases, and 2,780 male and 760 female controls. Exposure  
15427 assessment employed standardized questionnaires administered by trained interviewers for collection of  
15428 data regarding smoking history, sociodemographic characteristics, and lifetime occupational history  
15429 (company, tasks, specific exposures). The only chlorinated solvent specifically listed in the  
15430 questionnaire was trichloroethylene, although subjects could self-report other known exposures, such as

15431 PCE. A short-form questionnaire without the detailed job information was used for proxy interviews  
15432 (5% of men and 3% of women). Job histories were mapped to a job-exposure matrix to classify solvent  
15433 exposures by probability, intensity, frequency, and duration. Cumulative exposure indices were  
15434 calculated as the product of probability, frequency, intensity, and duration for each job, and then  
15435 categorized using deciles of the distribution in the control subjects. Lag times of 0, 5, and 10 years were  
15436 analyzed. Covariates considered in the analyses included age at interview, location, smoking history  
15437 (Comprehensive Smoking Index), number of jobs held, occupational exposure to asbestos, and in some  
15438 cases, socioeconomic status.

15439  
15440 Among controls, prevalence of lifetime exposure to chlorinated solvents was 8.5% for men and 2.1% for  
15441 women ([Mattei et al. 2014](#)). The individual solvent with the highest prevalence of exposure was  
15442 trichloroethylene (7.6% of male and 1.1% of female controls). Only 0.3% of male and 0.9% of female  
15443 controls had any exposure to PCE, and almost all of these were exposed to other solvents as well. Men  
15444 were exposed to PCE primarily as printers, while women were exposed primarily as launderers and dry  
15445 cleaners. Trichloroethylene was the only individual solvent with a significant number of study subjects  
15446 that were not exposed to any other chlorinated solvents. In order to elucidate effects of other solvents  
15447 (such as PCE) individually, despite the multiple overlapping chemical exposures, the researchers  
15448 performed stratified analysis of mutually exclusive multiple solvent exposures (e.g., trichloroethylene  
15449 alone, versus trichloroethylene plus PCE, versus trichloroethylene plus PCE and methylene chloride,  
15450 etc.).

15451  
15452 After adjustment for covariates, including socioeconomic status, the OR for PCE comparing ever  
15453 exposed to never exposed was 1.26 for men (95% CI = 0.87-1.82) based on 107 lung cancer cases and  
15454 94 controls with PCE exposure and 2.74 for women (95% CI = 1.23-6.09) based on 26 cases and 13  
15455 controls ([Mattei et al. 2014](#)). In analyses by cumulative PCE exposure (split into high and low groups  
15456 based on median cumulative exposure), ORs for men were 1.14 in the low-dose group (95% CI = 0.67-  
15457 1.94, 45 cases and 47 controls) and 1.36 in the high-dose group (95% CI = 0.84-2.22, 62 cases and 47  
15458 controls), while ORs for women were 3.80 in the low-dose group (95% CI = 1.41-10.24, 21 cases and 7  
15459 controls) and 1.43 in the high-dose group (95% CI = 0.37-5.50, 5 cases and 6 controls). In analyses  
15460 stratified by overlapping exposure to multiple solvents, ORs were elevated for women exposed to PCE  
15461 with trichloroethylene (2.39, 95% CI = 0.47-12.18, 6 cases and 3 controls) and with both  
15462 trichloroethylene and methylene chloride (4.57, 95% CI = 1.14-18.34, 12 cases and 3 controls), but not  
15463 those exposed to trichloroethylene alone (1.16, 95% CI = 0.64-2.11, 49 cases and 32 controls) or with  
15464 methylene chloride (0.73, 95% CI = 0.29-1.87, 12 cases and 17 controls) or methylene chloride and  
15465 chloroform and carbon tetrachloride (1.12, 95% CI = 0.31-4.08, 6 cases and 7 controls). In men, ORs  
15466 were also higher in the PCE groups (OR = 1.28-1.32) than the others (OR = 0.79-0.95), although the  
15467 difference was less pronounced than in women. These findings suggest an association between lung  
15468 cancer and PCE exposure, but are limited by low prevalence of PCE exposure among study subjects.

15469  
15470 ([Ruder et al. 2013](#)) conducted a population-based case-control study focused on the association between  
15471 exposure to chlorinated aliphatic solvents, including PCE, and risk of glioma. Eligible participants were  
15472 residents of non-metropolitan counties in the states of Iowa, Michigan, Minnesota, and Wisconsin who  
15473 were diagnosed with glioma between 1995 and 1997 (cases) or were residents of the counties on January  
15474 1, 1995 (controls). Histologically-confirmed primary intracranial glioma cases were identified from  
15475 neurosurgery offices and other participating health care facilities. A pool of candidate controls was  
15476 established prior to case enrollment based on the age and sex distribution of glioma cases from an earlier  
15477 time period, using state driver license records (ages 18-64 years) or Medicare data tapes (ages 65-80  
15478 years). Persons diagnosed with cancers other than glioma (20.6% of controls) were eligible to

15479 participate. Participants included 798 cases (91.5% of eligible cases) and 1,175 controls (70.4% of  
15480 eligible controls). Interviews of cases (n=438), case next-of-kin (n=360), and controls (n=1,141) were  
15481 performed to obtain occupational history. Standardized questionnaires were used to establish details  
15482 (employer name, industry, job title, tasks, materials used, and employment frequency) of jobs held for at  
15483 least 1 year between 16 years of age and 1992; the questionnaires asked explicit questions regarding  
15484 exposures to solvents, thinners, glues, inks, varnishes, stains, and paint strippers. An industrial hygienist  
15485 blinded to case status combined the job history information with the authors' exposure database (from  
15486 published literature sources) to estimate probability, frequency, and intensity of exposure, as well as  
15487 confidence in the probability and frequency of exposure. Cumulative exposures were estimated as the  
15488 product of employment duration, employment frequency, exposure frequency, and exposure intensity.  
15489 Analyses were adjusted for sex, age, and education. Sensitivity analyses were performed excluding cases  
15490 with job history based on proxy questionnaires (to improve validity of the exposure estimates) or  
15491 limiting the exposed group to those with high probability (>0.5) of exposure. Types of gliomas observed  
15492 in cases included glioblastoma multiforme (equivalent to stage 4 glioma) (58%), astrocytoma (22%),  
15493 oligodendroglioma (11%), and other (8%). A subset of participants agreed to provide blood samples for  
15494 GST genotyping; these data were used to analyze the influence of GST on the association between  
15495 glioma risk and chlorinated solvent exposure.

15496  
15497 ORs for PCE exposure and glioma risk were <1.0 in all analyses, including: when all subjects were  
15498 considered together (OR = 0.75, 95% CI = 0.62-0.91, 299 cases and 500 controls); when stratified by  
15499 sex; when analyzed as "any" versus no exposure; when analyzed by cumulative exposure; when cases  
15500 with proxy exposure data were excluded; and when exposed subjects were limited to those with high  
15501 probability of exposure ([Ruder et al. 2013](#)). GST genotype did not influence the relationship between  
15502 solvent exposure and glioma risk. Results were similarly negative for any chlorinated solvent and for the  
15503 other solvents considered individually. In this study, the large proportion of case questionnaires  
15504 completed by proxy (next of kin) is problematic, although excluding proxy interviews did not affect  
15505 results. Potential memory impairment (induced by glioma) among cases who did complete the  
15506 questionnaires may have affected exposure estimates in cases relative to controls. In addition, controls  
15507 were older than cases, and thus had greater chance of higher exposure from working during earlier eras,  
15508 and cases had slightly more education than controls, and therefore lower probability of solvent-related  
15509 employment. These limitations would tend to bias the risk estimates toward the null.

15510  
15511 ([Neta et al. 2012](#)) evaluated associations between solvent exposure and risk of glioma and meningioma  
15512 in a hospital-based study. Cases were patients at one of four hospitals (referral centers for brain cancers  
15513 in Massachusetts, Pennsylvania, and Arizona) who had received a histologically-confirmed diagnosis of  
15514 primary glioma or other neuroepitheliomatous neoplasm or meningioma within the previous 8 weeks. A  
15515 total of 484 cases of glioma (92% of eligible cases) and 197 cases of meningioma (94% of eligible  
15516 cases) agreed to participate. Controls were patients at the same hospitals who were receiving treatment  
15517 for non-cancer conditions. Controls were frequency matched on sex, age at interview, race/ethnicity,  
15518 hospital, and residential proximity to the hospital. A total of 797 controls (86% of eligible subjects)  
15519 agreed to participate. Trained interviewers administered questionnaires to patients (or a proxy if the  
15520 patient was too ill or deceased) to document jobs in which the patients worked for at least 6 months after  
15521 the age of 16 years; details included employer, dates of employment, job title, full or part time work  
15522 status, type of business, tasks, and materials and equipment used. Proxy interviews were conducted for  
15523 16% (n=78) of glioma cases, 8% (n=15) of meningioma cases and 3% (n=23) of controls. When  
15524 respondents indicated employment in jobs with chemical exposures, more detailed industry- or job-  
15525 specific questions were asked to obtain information on frequency and duration of solvent-related tasks as  
15526 well as other information pertaining to exposure (e.g., potential for dermal exposure, sensory

15527 descriptions) or mitigation of exposure (engineering controls, personal protective equipment). Results  
15528 were reviewed by expert industrial hygienists who identified incomplete or inconsistent answers;  
15529 investigators followed up with supplementary subject phone interviews to resolve these discrepancies.  
15530 Using the finalized job histories and exposure data from occupational health literature, industrial  
15531 hygienists assigned exposure levels for six solvents including PCE. Analyses were adjusted for age at  
15532 diagnosis, sex, race/ethnicity, hospital site, residential zone/proximity to hospital, and estimated  
15533 cumulative occupational exposure to potential confounders: lead, magnetic fields, herbicides, and  
15534 insecticides. Analyses by any/no exposure to a given solvent were also adjusted for exposure to other  
15535 solvents. The investigators determined that adjustment for education and smoking did not result in  
15536 changes to the effect estimates, so these covariates were not included in the final models. ORs  
15537 comparing high to low exposure were also calculated (in addition to any/none) to control for potential  
15538 unidentified differences between exposed and unexposed subjects. Finally, a lag time of 10 years was  
15539 analyzed by excluding exposures in the 10 years prior to diagnosis.  
15540

15541 The OR for glioma was 0.7 (95% CI = 0.5-0.9, 136 cases and 255 controls) for study subjects with  
15542 “possible” exposure to PCE and 0.7 (95% CI = 0.3-1.6, 9 cases and 20 controls) for those with  
15543 “probable” exposure ([Neta et al. 2012](#)). Results were similar when stratified by sex and various  
15544 measures of exposure (years exposed, cumulative exposure, average weekly exposure, highest  
15545 exposure). For meningioma, the ORs for “possible” and “probable” exposure were 0.9 (95% CI = 0.6-  
15546 1.3, 52 cases and 255 controls) and 0.5 (95% CI = 0.1-1.7, 3 cases and 20 controls), respectively,  
15547 without adjustment for exposure to other solvents and 1.0 (95% CI = 0.5-2.2) and 0.3 (95% CI = 0.1-  
15548 1.7), with the adjustment. Similarly, no clear associations were seen for the other solvents analyzed or  
15549 for the solvents collectively. Because relatively few subjects had exposures characterized as high, the  
15550 study had limited power to evaluate dose-response relationships (e.g., only 10 controls and 3 glioma  
15551 cases were classified as having high cumulative PCE exposure). The researchers noted that the  
15552 complexity of use of these solvents, which have been used interchangeably and at times together, makes  
15553 evaluation of specific exposures difficult. Exposure misclassification and potential memory impairment  
15554 (induced by glioma) among cases would tend to bias the risk estimates toward the null.  
15555

15556 ([Carton et al. 2017](#)) investigated the relationship between occupational solvent exposure and head and  
15557 neck cancer in a case-control study in France. The final study group included 296 women with  
15558 squamous cell carcinoma of the oral cavity, oropharynx, hypopharynx, or larynx and 775 controls.  
15559 Incident cases were women aged 18-75 years at diagnosis between 2001 and 2007 identified from  
15560 cancer registries in 10 geographic areas in France and whose cancers were histologically confirmed.  
15561 Controls were chosen at random from the same geographic areas with age and sex distribution  
15562 comparable to cases and distribution of socioeconomic status similar to the general population.  
15563 Participation rate was 82.5% for cases and 80.6% for controls. Subjects were interviewed in person  
15564 using a standardized questionnaire for detailed occupation history, residential history, and lifetime  
15565 alcohol and tobacco consumption. Job-exposure matrices developed for the French population by the  
15566 French Institute of Health Surveillance were used to estimate probability, intensity, and frequency of  
15567 exposure to PCE and other solvents for each job held at least 1 month. The products of duration,  
15568 probability, intensity, and frequency of exposure for each job were summed to give cumulative  
15569 exposure, and cumulative exposure was divided by total duration of employment to calculate the mean  
15570 intensity of exposure.  
15571

15572 Controls smoked significantly less and drank alcohol significantly less than cases and were of  
15573 significantly higher socioeconomic status ([Carton et al. 2017](#)). Age and geographic distributions differed  
15574 significantly as well. Analyses were performed by unconditional logistic regression and adjusted for

15575 geographical area, age, smoking status (never smoker, former smoker, and current smoker), tobacco  
15576 consumption in pack-years, and alcohol consumption in drink-years. Socioeconomic status, assessed by  
15577 the last occupation held and by the longest held occupation, was included in preliminary models, but  
15578 removed from the final models because it did not significantly affect results.  
15579

15580 There was a significant association between “ever” exposed to PCE and head and neck cancer (OR =  
15581 2.97, 95% CI = 1.05-8.45), based on 10 cases and 13 controls ([Carton et al. 2017](#)). Of these, however, no  
15582 cases and only 3 controls were exposed to PCE alone without other chlorinated solvents. The rest were  
15583 exposed to PCE in combination with trichloroethylene (OR = 4.47, 95% CI = 1.27-15.8, 9 cases and 7  
15584 controls) or with trichloroethylene and methylene chloride (OR = 2.16, 95% CI = 0.19-24.1, 1 case and  
15585 3 controls). “Ever” exposed to trichloroethylene was also significantly associated with head and neck  
15586 cancer (OR = 2.15, 95% CI = 1.21-3.81) based on many more subjects (38 cases and 60 controls). For  
15587 “ever” exposed to trichloroethylene alone, the OR was 1.81 (95% CI = 0.81 4.04) based on 20 cases and  
15588 32 controls. The 10 cases “ever” exposed to PCE (with trichloroethylene and/or methylene chloride)  
15589 included 1 oral cavity (OR = 0.98, 95% CI = 0.11-8.47), 5 oropharynx (OR = 3.43, 95% CI = 1.01-11.8),  
15590 0 hypopharynx, and 4 larynx (OR = 7.95, 95% CI = 1.92-32.9). The 38 trichloroethylene cases were  
15591 split primarily between oral cavity (12 cases, OR = 2.12, 95% CI = 0.97-4.60), oropharynx (13 cases,  
15592 OR = 1.66, 95% CI = 0.78-3.54), and larynx (10 cases, OR = 3.80, 95% CI = 1.55-9.32). There was no  
15593 association between duration, mean intensity of exposure, or cumulative exposure index for PCE and  
15594 head and neck cancer. There was a small significant relationship between mean intensity of  
15595 trichloroethylene exposure and head and neck cancer (OR = 1.30, 95% CI = 1.01-1.66). These results  
15596 suggest a relationship between trichloroethylene and head and neck cancer. The apparent relationship for  
15597 “ever” exposed to PCE may reflect co-exposure to trichloroethylene.  
15598

15599 A companion analysis of head and neck cancers in men was performed as part of the same study ([Barul](#)  
15600 [et al. 2017](#)). Methods were the same as reported by ([Carton et al. 2017](#)). The analysis included a total of  
15601 1,857 cases and 2,780 controls. As for the women, cases smoked more than controls and had higher  
15602 alcohol consumption. There was no relationship between “ever” exposed to PCE and head and neck  
15603 cancer in men (OR = 1.04, 95% CI = 0.69-1.59, 70 cases/89 controls). Analysis based on cumulative  
15604 PCE exposure, however, showed a nonsignificant increase in head and neck cancer risk in the high-  
15605 exposure group (OR = 1.81, 95% CI = 0.68-4.82, 14 cases/11 controls) that was traced to a significant  
15606 increase in laryngeal cancer in this group (OR = 3.86, 95% CI = 1.30-11.48, 8 cases). All subjects  
15607 exposed to PCE were exposed to other chlorinated solvents as well, primarily trichloroethylene. In  
15608 contrast to the results in women, however, there was no evidence in the men of an association between  
15609 trichloroethylene exposure and laryngeal cancer or head and neck cancers more broadly.  
15610

15611 ([Talibov et al. 2014](#)) studied occurrence of acute myeloid leukemia (AML) relative to occupational  
15612 solvent exposure in a large population-based case-control study in four Nordic countries. The study  
15613 population comprised a subset of the NOCCA (Nordic Occupational Cancer Study) cohort of 14.9  
15614 million individuals from Finland, Iceland, Norway, Denmark, and Sweden who participated in  
15615 population censuses in 1960, 1970, 1980/1981, and/or 1990. For this study, all incident AML cases  
15616 diagnosed from 1961 to 2005 were extracted from the NOCCA cohort (the researchers did not have  
15617 access to individual records from Denmark, so those data were not included). Cases included in the  
15618 study were at least 20 years of age at diagnosis and had occupational information from at least one  
15619 census record (n=14,982). Five controls were randomly selected per case, matched for year of birth, sex,  
15620 and country (n=74,505). Controls were alive and free from AML on the date of diagnosis of the case.  
15621 Cases and controls could have a history of any cancer other than AML. Occupational exposures to  
15622 solvents were estimated based on the NOCCA job exposure matrix (developed by national experts from



15623 the Nordic countries), which characterizes proportion of exposed (P) and mean level of exposure for  
15624 exposed persons (L) for 29 exposure agents in 300 specific occupations over 4 time periods from 1945  
15625 to 1994, but does not account for heterogeneity of exposure within an occupation (e.g., with tasks  
15626 performed or workplace). Cumulative exposure for each subject was calculated by multiplying  
15627 employment period (T) in years by  $P \times L$  for each job held and summing the products over their working  
15628 career (assumed to be ages 20-65 years), based on occupational codes in census records for each subject.  
15629 The census records provide snapshots in time, but do not provide a complete picture of work history; for  
15630 this study, it was assumed that when occupation changed from one census to the next that the change  
15631 occurred in the middle of the time period between censuses. Exposures in the 10 years prior to diagnosis  
15632 were not counted (alternative lag times of 0, 3, 5, 7, and 20 years were also used, but these data were not  
15633 shown). Subjects were split into low (0-50th percentile), moderate (50-90th percentile), and high (>90th  
15634 percentile) cumulative exposure groups in the analysis for each agent. Unexposed subjects served as the  
15635 reference group, although these data were not shown. Conditional logistic regression was used to  
15636 estimate HRs. Models included adjustment for exposure to other solvents and also ionizing radiation and  
15637 formaldehyde. The models did not adjust for suspected lifestyle (e.g., smoking) or genetic risk factors  
15638 because that information was not available for study subjects.

15639  
15640 No significant association was found between PCE exposure and AML ([Talibov et al. 2014](#)). HRs in the  
15641 low (>0-<12.1 ppm/year), medium (12.1-106 ppm/year), and high (>106 ppm/year) cumulative exposure  
15642 groups were 1.07 (95% CI = 0.83-1.38, 89 cases/472 controls), 0.83 (95% CI = 0.61-1.12, 67 cases/381  
15643 controls), and 0.72 (95% CI = 0.39-1.34, 16 cases/96 controls), respectively, and the p-level for dose-  
15644 response trend was 0.39. There were also no significant findings for other solvents in this study,  
15645 including benzene, which has shown evidence of a positive association in other studies. A small  
15646 nonsignificant elevation of AML risk was seen for high cumulative exposure to toluene (HR = 1.35,  
15647 95% CI = 0.74-2.46, 76 cases/400 controls). Although the study included a large number of subjects, the  
15648 low prevalence of occupational exposure to solvents in general, and PCE in particular, limits confidence  
15649 in these results.

15650  
15651 A similar study was performed by ([Vlaanderen et al. 2013](#)) to investigate the association between  
15652 solvent exposure and NHL, MM, and kidney and liver cancer in a subset of the NOCCA cohort. For this  
15653 study, incident cases of NHL, MM, kidney and liver cancer were extracted from the cohort, which  
15654 included all NOCCA subjects aged 30-64 years who participated in the 1960, 1970, 1980-1981, and/or  
15655 1990 census in Finland, Iceland, Norway, or Sweden and were still alive on January 1 of the year  
15656 following the census. The study included 76,130 kidney cancer cases, 23,896 liver cancer cases, 69,254  
15657 NHL cases, and 35,534 MM cases. For each case, five controls were randomly selected from all cohort  
15658 members alive and cancer free at the time of diagnosis of the case, matched for age, sex, and country.  
15659 Occupational exposures to solvents were estimated based on the NOCCA job exposure matrix, as  
15660 described above. Cumulative exposure was calculated by adding annual exposures, starting at age 20  
15661 years or start of working career, whichever occurred later, and ending at incidence date of case or at age  
15662 65 years, whichever occurred first. For this study, it was assumed that individuals continued in the same  
15663 occupation reported in the census until the calendar year in which the census was updated, and that  
15664 workers had worked in the job they reported in the first census since age of entry into the cohort (30  
15665 years). Conditional logistic regression was used to estimate HRs. For analysis, subjects were split into  
15666 tertiles with approximately equal numbers of exposed controls based on cumulative exposure.  
15667 Alternatively, high-exposure groups were defined based on 90th percentile of cumulative exposure or  
15668 90th percentile of average intensity  $\times$  prevalence of exposure (calculated by dividing cumulative  
15669 exposure by duration of exposure). Unexposed subjects served as the reference group in all analyses,  
15670 although these data were not shown. Pearson correlation coefficients were calculated to describe the

15671 association between potential confounding exposures between agents (solvents and ionizing radiation).  
15672 The models did not adjust for lifestyle (e.g., smoking, alcohol intake) risk factors because that  
15673 information was not available for study subjects. Model fit was not affected by lagging calculation of  
15674 cumulative exposure by 0, 1, 5, 10, or 20 years, so unlagged results were presented.  
15675

15676 In the analysis by tertiles of cumulative exposure, no significant associations were found between first,  
15677 second, or third tertile of cumulative exposure to PCE and NHL, MM, or liver or kidney cancer in men,  
15678 women, or both sexes combined ([Vlaanderen et al. 2013](#)). In the analysis of high-exposure groups,  
15679 significant or near significant associations were found for NHL in men (HR = 1.54, 95% CI = 0.99-2.42  
15680 based on 25 cases using the cumulative exposure metric; HR = 1.74, 95% CI = 1.15-2.64 based on 30  
15681 cases using the average intensity × prevalence metric), but not in women (HR = 0.94, 95% CI = 0.74-  
15682 1.20 based on 77 cases using the cumulative exposure metric; HR = 1.12, 95% CI = 0.88-1.42 based on  
15683 83 cases using the average intensity × prevalence metric). PCE findings for other tumors were limited to  
15684 slight nonsignificant increases in HR for MM and liver cancer in men and/or women based on one or the  
15685 other of the high-exposure metrics. Among the other agents analyzed, slight associations were noted  
15686 between ionizing radiation and liver cancer and MM and between benzene and liver cancer. Although  
15687 PCE exposure in this study was correlated with exposure to trichloroethylene and other chlorinated  
15688 solvents (no tumor associations found for these agents), it was not correlated with exposure to ionizing  
15689 radiation or benzene. These results suggest an association between exposure to PCE and NHL in men,  
15690 and possibly to MM and liver cancer as well, although those data are much weaker. As in the previously  
15691 described study, the low prevalence of occupational exposure to PCE is a limiting factor for this study.  
15692

15693 In another case-control study based on the NOCCA cohort, ([Hadkhale et al. 2017](#)) studied the potential  
15694 link between solvent exposure and bladder cancer. All incident cases of bladder cancer were extracted  
15695 from the NOCCA cohort, and persons with a minimum age of 20 years at diagnosis and having  
15696 occupation information from at least one census record before diagnosis were included in the study. Five  
15697 controls were randomly selected for each case from among individuals alive and free from bladder  
15698 cancer at the date of diagnosis of the case, matched by birth year and sex. Cases and controls could have  
15699 a history of any cancer type other than bladder cancer. A total of 113,343 cases and 566,715 controls  
15700 were included. Occupational exposures to solvents were estimated based on the NOCCA job exposure  
15701 matrix, as described above. Exposure was assumed to start at the age of 20 years and end at the date of  
15702 diagnosis or at 65 years, whichever occurred first. If there were different occupational codes in the  
15703 census records for a given person, the individual was assumed to have changed occupations at the mid-  
15704 point between two known census years. Cumulative exposure was estimated by summing annual  
15705 exposure estimates for the entire employment period. In addition to organic solvents, other exposures  
15706 assessed were ionizing radiation, asbestos, benzo[a]pyrene, diesel engine exhaust, and sulfur dioxide, all  
15707 considered to be potential confounders. Subjects were split into low (0-50th percentile), moderate (50-  
15708 90th percentile), and high (>90th percentile) cumulative exposure groups in the analysis for each agent,  
15709 which was performed by conditional logistic regression. Unexposed subjects served as the reference  
15710 group. Exposures in the 10 years prior to diagnosis were not counted (lag times of 0 or 20 years were  
15711 also performed, but these results were not presented). Models were adjusted for exposure to other  
15712 solvents and agents, but not nonoccupational risk factors (e.g., smoking, alcohol consumption) because  
15713 that information was not available for study subjects.  
15714

15715 HRs for bladder cancer in the low (>0<13.6 ppm/year), medium (13.6-87.55 ppm/year), and high (>87.5  
15716 ppm/year) cumulative PCE exposure groups were 1.00 (95% CI = 0.92-1.09, 747 cases/3,560 controls),  
15717 1.12 (95% CI = 1.02-1.23, 660 cases/2,783 controls), and 0.94 (95% CI = 0.73-1.22, 159 cases/702  
15718 controls), respectively, and the p-level for dose-response trend was 0.10 ([Hadkhale et al. 2017](#)). These

15719 results show a slight significant increase in risk of bladder cancer in the medium PCE exposure  
15720 category, but no increase in the high-exposure group and no significant dose-related trend, suggesting a  
15721 cause other than PCE exposure for the slight association observed in the medium-exposure group.  
15722 Bladder cancer risks were significantly elevated in the high-exposure groups for trichloroethylene,  
15723 benzene, toluene, and ionizing radiation. Although the models included adjustment for co-exposure to  
15724 other agents, the researchers noted the difficulty of disentangling the effects of PCE and  
15725 trichloroethylene (structurally similar chemicals with overlapping uses) using the available data. There  
15726 were approximately 5 times more cases with trichloroethylene exposure than PCE exposure.

15727  
15728 ([Morales-Suárez-Varela et al. 2013](#)) studied the potential association between occupational solvent  
15729 exposure and mycosis fungoides (MF, the most common form of cutaneous T-cell lymphoma, a  
15730 heterogenous group of NHL). Cases were patients aged 35 to 69 years diagnosed with MF in 25 selected  
15731 areas from six European countries between January 1, 1995, and June 30, 1997. Of 118 pathologically-  
15732 confirmed cases, 100 agreed to be interviewed for this study (85% participation rate). Population  
15733 controls were randomly selected from the same areas as cases, frequency matched by sex and age. The  
15734 study was part of a larger study of seven cancers: MF, gall bladder, small intestine, bone, eye melanoma,  
15735 thymus, and breast cancer. The controls served as a common pool of controls for all seven groups of  
15736 cancer cases included in the larger study. In all, 4,629 eligible controls were identified and 3,156 were  
15737 interviewed (participation rate = 68%). For the MF study, only controls in the strata defined by age and  
15738 study area where at least one MF case was diagnosed were included (2,846 controls, including 1,957  
15739 men and 889 women). Due to illness, 4 case and 95 control interviews were conducted with surrogates.  
15740 Interviews were performed using standardized questionnaires that included questions on lifestyle factors  
15741 (smoking, alcohol consumption, etc.) and lifelong occupational history, including details regarding  
15742 specific tasks performed, products used, etc. Occupational exposures to solvents were assessed for each  
15743 job held over 6 months using a job exposure matrix developed by the French Institute of Health  
15744 Surveillance, which provided semiquantitative indicators of exposure probability, frequency, and  
15745 intensity for each solvent and occupation. A cumulative exposure score for each solvent was calculated  
15746 for each study subject as the sum of the job-specific exposure scores over his or her lifetime job history.  
15747 Subjects were split into high- and low-exposure groups based on median cumulative exposure in the  
15748 analysis for each agent. Unexposed subjects served as the reference group. The analysis was conducted  
15749 by unconditional logistic regression, with adjustments for age, sex, country, smoking habit, alcohol  
15750 intake, body mass index, and level of education. No adjustment for co-exposure to other chemicals was  
15751 noted. Alternative analyses were performed introducing lag times of 5, 10, or 15 years and excluding  
15752 jobs with low probability of exposure, but these were not shown because they did not affect findings.

15753  
15754 For PCE, the results suggested a significant elevation of MF risk in high-dose women (OR = 11.38, 95%  
15755 CI = 1.04-124.85), but this finding is highly uncertain, as indicated by the extremely wide confidence  
15756 interval, because it is based on only 2 cases ([Morales-Suárez-Varela et al. 2013](#)). There were no female  
15757 cases with low-dose exposure to PCE. Among men, there were 2 cases with low-dose exposure (OR =  
15758 1.80, 95% CI = 0.22-14.80) and 2 with high-dose exposure (OR = 1.60, 95% CI = 0.30-13.60). The low  
15759 prevalence of PCE exposure and small number of cases in this study limit interpretation of these  
15760 findings.

15761  
15762 ([Purdue et al. 2017](#)) conducted an analysis for associations between exposure to PCE and other  
15763 chlorinated solvents and kidney cancer within the U.S. Kidney Cancer Study, a population-based case-  
15764 control study conducted in Detroit, Michigan and Chicago, Illinois. Cases were histologically confirmed  
15765 incident kidney cancer newly diagnosed in Detroit from February 2002 until July 2006 (white cases) or  
15766 January 2007 (black cases) and in Chicago during 2003. Eligible controls in both locations were selected

15767 from the general population, frequency matched to cases based on sex, age (5-year intervals), and race.  
15768 The study was designed to maximize the number of black participants. Controls were frequency  
15769 matched to cases at a 2:1 ratio for blacks and a 1:1 ratio for whites. A total of 1,217 cases (77% of the  
15770 1,571 that the researchers attempted to recruit) and 1,235 controls (54% of the 2,269 that the researchers  
15771 attempted to recruit) participated in the study. Copies of medical records were obtained for all cases to  
15772 confirm the kidney cancer diagnosis, and the original diagnostic slides were obtained for 706 cases for  
15773 review by an experienced pathologist. Participants were interviewed for a wide variety of topics  
15774 including work history for all jobs held for at least 12 months starting at age 16 years. For selected  
15775 occupations, detailed histories were collected related to solvent exposures.  
15776

15777 Job and task exposure matrices were developed for each of the six solvents included in the study by an  
15778 industrial hygienist using information from a systematic review of the industrial hygiene literature  
15779 ([Purdue et al. 2017](#)). Using the literature review, the exposure matrices, the occupational histories, and  
15780 the information collected in the job modules, the industrial hygienist assessed levels of exposure  
15781 probability, frequency, and intensity for each chlorinated solvent for each job. The job-specific estimates  
15782 of probability, frequency, and intensity for each participant were integrated to develop metrics of  
15783 exposure for each participant for each chlorinated solvent, including duration of exposure (sum of  
15784 number of years worked at each job across all jobs with exposure probability  $\geq 50\%$ ), cumulative hours  
15785 exposed (sum of the product of the job-specific frequency midpoint and the job duration in weeks across  
15786 all jobs with an exposure probability  $\geq 50\%$ ), and average weekly exposure (cumulative hours exposed  
15787 divided by the duration of exposure in weeks).  
15788

15789 For the analysis, solvent exposures were split into tertiles among exposed controls, and unexposed  
15790 participants were used as referents ([Purdue et al. 2017](#)). Unconditional logistic regression modelling was  
15791 performed, including adjustment for location, age, race, sex, education, smoking history, body mass  
15792 index, and self-reported history of hypertension. Additional analyses incorporated 5- or 15-year  
15793 exposure lags, restricted participants to individuals with high confidence of exposure, or excluded  
15794 participants with  $\geq 50\%$  probability of exposure to trichloroethylene.  
15795

15796 Prevalence of PCE exposure was low, with  $<4\%$  of cases and controls assessed as having exposure  
15797 probability  $\geq 50\%$  ([Purdue et al. 2017](#)). Prevalence of exposure was low for other solvents as well,  
15798 including trichloroethylene. The most common tasks associated with PCE exposure were degreasing and  
15799 dry cleaning, accounting for 41% and 32% of exposures, respectively. Degreasing also accounted for  
15800 most exposures to trichloroethylene, carbon tetrachloride, and 1,1,1-trichloroethane. In analyses among  
15801 controls, after excluding participants unexposed to any chlorinated solvent, solvent exposure  
15802 probabilities were moderately correlated with one another.  
15803

15804 No significant association was found between kidney cancer risk and probability of exposure to PCE  
15805 (e.g., OR = 1.2, 95% CI = 0.6-2.3, 22 cases/16 controls for those with probability of exposure  $\geq 90\%$ ) or  
15806 PCE exposure duration (e.g., OR = 1.1, 95% CI = 0.5-2.5, 13 cases/11 controls for those exposed  $\geq 10$   
15807 years), average weekly exposure (e.g., OR = 1.1, 95% CI = 0.4-3.1, 11 cases/14 controls for those  
15808 exposed  $>15$  hours/week), or cumulative hours of exposure (e.g., OR = 0.9, 95% CI = 0.3-3.3, 8  
15809 cases/11 controls for those in highest tertile) for those with  $\geq 50\%$  probability of exposure ([Purdue et al.](#)  
15810 [2017](#)). When the analysis was restricted to those with high-intensity exposure to PCE, however, there  
15811 was a statistically significant increase in kidney cancer risk for those in the highest tertile of cumulative  
15812 hours exposed (OR = 3.1, 95% CI = 1.3-7.4, 14 cases/8 controls,  $P_{\text{trend}} = 0.03$ ). This relationship was  
15813 also seen in additional analyses that incorporated 5-year (OR = 3.5, 95% CI = 1.3-10.0,  $P_{\text{trend}} = 0.03$ ) or  
15814 15-year (OR = 6.2, 95% CI = 1.8-21.3,  $P_{\text{trend}} = 0.003$ ) exposure lag periods, included only jobs

15815 assigned an exposure probability with high confidence (OR = 5.1, 95% CI = 1.5-7.2, P<sub>trend</sub> = 0.12), or  
15816 excluded participants with  $\geq 50\%$  probability of exposure to trichloroethylene (OR = 3.0, 95% CI = 0.99-  
15817 9.0, 17 cases/14 controls, P<sub>trend</sub> = 0.08). Similar analyses performed for trichloroethylene found no  
15818 significant associations or exposure-response trends, although a nonsignificant increase in kidney cancer  
15819 risk was seen in the high tertile of cumulative hours exposed among those with high-intensity exposure  
15820 (OR = 1.7, 95% CI = 0.8-3.8, 18 cases and 8 controls, P<sub>trend</sub> = 0.28).

15821  
15822 This study found no evidence of association between kidney cancer risk and exposure to chlorinated  
15823 solvents other than PCE and trichloroethylene, and only limited evidence for trichloroethylene ([Purdue  
15824 et al. 2017](#)). High exposure to PCE, however, was associated with kidney cancer, and the result was  
15825 independent of exposure to trichloroethylene.

15826  
15827 ([Heck et al. 2013](#)) conducted an exploratory study of exposure to air toxics during pregnancy in relation  
15828 to risk of neuroblastoma in offspring. Cases of neuroblastoma among California residents younger than  
15829 6 years old, born and diagnosed between 1990 and 2007, and listed in the California Cancer Registry  
15830 were matched to California birth certificates using first and last names and date of birth (89% matching  
15831 rate). Controls, frequency matched by year of birth to all childhood cancer cases for the same time  
15832 period, were randomly selected from California birth records of children who had no cancer diagnosis  
15833 before the age of 6 years and matched to California death records to exclude those (n=1,522) who died  
15834 of other causes prior to the age of 6. Birth address, as listed on the birth certificate, was used to estimate  
15835 exposure to air toxics, including PCE, based on distance from each address to monitors in California's  
15836 air toxics monitoring network (39 air monitors across the state, primarily positioned near heavily  
15837 trafficked highways, industrial areas, and agriculturally intense rural regions) and measurements made at  
15838 the nearest monitor to each residence, which were used to calculate average exposures for each trimester  
15839 and the entire pregnancy period for each participant using date of birth and gestational age obtained  
15840 from the birth certificate. The study included a total of 75 cases and 14,602 controls who lived within 5  
15841 km of a monitor and had measurement values for at least one pollutant. Unconditional logistic regression  
15842 was used to calculate ORs and CIs, adjusted for mother's age, mother's race, birth year, and method of  
15843 payment for prenatal care (proxy for family income). No increase in risk of neuroblastoma was seen  
15844 with PCE exposure for cases within 5 km of a monitor (OR = 1.06, 95% CI = 0.84-1.33, 67 cases/12,041  
15845 controls) or within 2.5 km of a monitor (OR = 1.01, 95% CI = 0.62-1.64, 21 cases/3,635 controls).

15846  
15847 ([Bulka et al. 2016](#)) looked at spatial patterns of diffuse large B-cell lymphoma (DLBCL) incidence in  
15848 relation to residential proximity to toxic release sites in Georgia. The Georgia Comprehensive Cancer  
15849 Registry was used to identify all DLBCL cases in adults ( $\geq 20$  years) residing in Georgia at diagnosis  
15850 during 1999-2008. Subjects without age, sex, or race information were excluded from the analysis.  
15851 Included cases (n=3581) were aggregated by census tract, and standardized incidence ratios (SIR) were  
15852 calculated for each tract by dividing the number of observed cases by expected cases, derived by  
15853 standardizing DLBCL incidence rates from Georgia to national DLBCL incidence rates by age, sex, and  
15854 race. GIS (geographic information system) software was used to examine the spatial distribution of TRI  
15855 (Toxics Release Inventory) sites and SIRs by census tract. From 1988 to 1998, Georgia facilities  
15856 reported the release of PCE at 33 TRI sites, with releases ranging from 5 to 1,575,644 lb. TRI sites for  
15857 the other chemicals studied ranged from 3 to 86 sites. The study found that relative risk of DLBCL  
15858 decreased as mean distance to TRI sites increased for TRI sites for most (8/9) of the contaminants  
15859 studied, including PCE. The strongest such relationship was found for formaldehyde, which showed a  
15860 0.58% decrease in DLBCL risk for every mile of increase in distance to release site. For PCE, the  
15861 decrease in risk was 0.27% per mile. The effect of mean distance on DLBCL incidence from all of the

15862 release sites was strongest for African Americans. Quantity of chemicals released was not included in  
15863 the analysis.  
15864

## 15865 **F.2 Animal Studies**

15866 In a 2-year inhalation study by ([NTP 1986a](#)), F344/N rats were exposed to PCE vapors at 0, 200, or 400  
15867 ppm for 6 hours/day, 5 days/week for 103 weeks. The incidence of mononuclear cell leukemia (MCL)  
15868 showed a positive trend in males (control: 28/50, 200 ppm: 37/50, 400 ppm: 37/50) and females  
15869 (control: 18/50, 200 ppm: 30/50, 400 ppm: 29/50), with a dose-related increase in severity of MCL in  
15870 both sexes. In addition, the time to onset was decreased in exposed females, compared to controls. When  
15871 only advanced (stage 3) MCL was considered, the incidence was statistically significantly increased in  
15872 male and female rats exposed to 400 ppm (males - control: 20/50, 200 ppm: 24/50, 400 ppm: 27/50;  
15873 females - control: 10/50, 200 ppm: 18/50, 400 ppm: 21/50). The incidence of testicular interstitial cell  
15874 tumors was increased in exposed male rats, with a statistically significant positive trend (control: 35/50,  
15875 200 ppm: 39/49, 400 ppm: 41/50). Renal tubular cell hyperplasia was observed in exposed male rats  
15876 (control: 0/49, 200 ppm: 3/49, 400 ppm: 5/50) and in one treated female rat (1/50 at 400 ppm only), and  
15877 renal tubular adenomas and adenocarcinomas were observed in males (combined incidence - control:  
15878 1/49, 200 ppm: 3/49, 400 ppm: 4/50) but not females. Although the increase in kidney tumors was not  
15879 statistically significant, renal tubular carcinomas are considered rare in this strain of rat and ([U.S. EPA  
15880 2012c](#)) concluded that a dose-response relationship is apparent when the combined incidence of  
15881 proliferative and neoplastic lesions was considered in combination with tumor severity. A biologically  
15882 significant elevation of brain gliomas, another rare tumor type, was observed in male (control: 1/50, 200  
15883 ppm: 0/50, 400 ppm: 4/50) and female (control: 1/50, 200 ppm: 0/50, 400 ppm: 2/50) rats. The  
15884 significance of the brain glioma findings is supported by the earlier occurrence of brain tumors in  
15885 exposed animals (week 88 in males, week 75 in females), compared to controls (week 99 in males, week  
15886 104 in females) ([U.S. EPA 2012c](#)).

15887 In the same study by ([NTP 1986a](#)), B6C3F1 mice were exposed to concentrations of PCE of 100 or 200  
15888 ppm for 6 hours/day, 5 days/week for 103 weeks. Statistically significant dose-related increases were  
15889 observed in the incidence of hepatocellular carcinoma (males - control: 7/49, 100 ppm: 25/49, 200 ppm:  
15890 26/50; females - control: 1/48, 100 ppm: 13/50, 200 ppm: 36/50) and combined incidence of  
15891 hepatocellular adenomas or carcinomas in male and female mice (males - control: 17/49, 100 ppm:  
15892 31/49, 200 ppm: 41/50; females - control: 4/48, 100 ppm: 17/50, 200 ppm: 38/50). The incidences of  
15893 hepatocellular carcinoma and hepatocellular adenomas or carcinomas combined were significantly  
15894 increased, compared to controls, at both 100 and 200 ppm in males and females. In several instances,  
15895 hepatocellular carcinomas metastasized to the lungs in males (control: 2/49, 100 ppm: 7/49, 200 ppm:  
15896 1/50) and females (control: 0/48, 100 ppm: 2/50, 200 ppm: 7/50).

15897 In a 2-year inhalation study conducted by ([JISA 1993](#)), F344/DuCrj rats were exposed to PCE vapors at  
15898 0, 50, 200, or 600 ppm. A statistically significant dose-related increase ([statistical analysis by statistical  
15899 analysis by statistical analysis by statistical analysis by U.S. EPA 2012c](#)) was observed in the incidence  
15900 of MCL in males (control: 11/50, 50 ppm: 14/50, 200 ppm: 22/50, 600 ppm: 27/50) and females  
15901 (control: 10/50, 50 ppm: 17/50, 200 ppm: 16/50, 600 ppm: 19/50). The increase in MCL incidence  
15902 achieved statistical significance in males exposed to 600 ppm, compared to control males. The time to  
15903 first occurrence of MCL was decreased in exposed female rats (weeks 66-74 in exposed groups)  
15904 compared to control female rats (week 100). Also, there was a dose-related increase in the overall  
15905 number of unscheduled deaths attributed to MCL in males and females.

15906 ([JISA 1993](#)) also exposed Crj:BDF1 mice to PCE at 0, 10, 50, or 250 ppm for 6 hours/day, 5 days/week  
15907 for 104 weeks. Dose-related increases in the incidences of hepatocellular adenomas (males - control:  
15908 7/50, 10 ppm: 13/50, 50 ppm: 8/50, 250 ppm: 26/50; females - control: 3/50, 10 ppm: 3/47, 50 ppm:  
15909 7/49, 250 ppm: 26/49), hepatocellular carcinomas (males - control: 7/50, 10 ppm: 8/50, 50 ppm: 12/50,  
15910 250 ppm: 25/50; females - control: 0/50, 10 ppm: 0/47, 50 ppm: 0/49, 250 ppm: 14/49), and combined  
15911 hepatocellular adenomas or carcinomas were observed in males and females (males - control: 13/50, 10  
15912 ppm: 21/50, 50 ppm: 19/50, 250 ppm: 40/50; females - control: 3/50, 10 ppm: 3/47, 50 ppm: 7/49, 250  
15913 ppm: 33/49). The incidences of hepatocellular adenoma, hepatocellular carcinoma, and combined  
15914 hepatocellular adenoma or carcinoma were statistically significantly increased at 250 ppm, relative to  
15915 controls, in both sexes. A small increase in liver and spleen hemangiosarcomas (reported as malignant  
15916 hemangioendotheliomas) was also observed in treated male mice (liver - control: 1/50, 10 ppm: 1/50, 50  
15917 ppm: 5/50, 250 ppm: 5/50; spleen - control: 1/50, 10 ppm: 1/50, 50 ppm: 3/50, 250 pm: 5/50). The  
15918 combined incidence of hemangiosarcomas or hemangiomas (reported as malignant or benign  
15919 hemangioendotheliomas, respectively) occurring in the liver, spleen, fat, subcutaneous skin, and heart  
15920 was statistically significantly increased in male mice (combined incidence - control: 4/50, 10 ppm: 2/50,  
15921 50 ppm: 7/50, 250 ppm: 11/50) (analysis by ([U.S. EPA 2012c](#))). In addition, there was a statistically  
15922 significant positive dose-related trend in the incidence of adenoma of the Harderian gland in male mice  
15923 (control: 2/50, 10 ppm: 2/50, 50 ppm: 2/50, 250 ppm: 8/50).

15924 In a lifetime bioassay by ([NCI 1977](#)), Osborne-Mendel rats were administered PCE for 78 weeks via  
15925 gavage in corn oil for 5 days/week, followed by a 32-week observation period. Dose adjustments were  
15926 made throughout the exposure period depending upon the tolerance of treated animals to the existing  
15927 dose level. Administered doses were 500-700 mg/kg-day in the low dose and 1,000-1,400 mg/kg-day in  
15928 the high-dose males, with 7 dose-free weeks occurring intermittently during the last 33 weeks of  
15929 exposure. Time-weighted average (TWA) doses during the 78-week treatment period were  
15930 approximately 470 mg/kg-day at the low dose and approximately 950 mg/kg-day at the high dose. Rats  
15931 showed no significant treatment-related increases in neoplastic lesions, compared to controls, and there  
15932 were no significant positive dose-related trends. A high rate of early death was observed in treated rats.  
15933 At the high dose, mortality was 50% in males by week 44 and in females by week 66. Respiratory  
15934 disease and pneumonia were observed in both treated and control rats, while toxic nephropathy occurred  
15935 only in treated animals (males - low dose: 43/49, high dose: 47/50; females - low dose: 29/50, high dose:  
15936 39/50). Due to the high rate of early death in treated rats, ([NCI 1977](#)) determined that the  
15937 carcinogenicity of PCE in rats could not be evaluated from the results of this study.

15938 ([NCI 1977](#)) also exposed B6C3F1 mice to PCE by gavage in corn oil for 78 weeks (5 days/week),  
15939 followed by a 12-week observation period. Male mice were administered 450 or 900 mg/kg-day for the  
15940 first 11 weeks, after which the doses were increased to 550 or 1,100 mg/kg-day, respectively, for the  
15941 next 67 weeks. Female mice received 300 or 600 mg/kg-day during the first 11 weeks, and doses were  
15942 increased to 400 or 800 mg/kg-day, respectively, for the subsequent 67 weeks. The TWA doses (5  
15943 days/week for 78 weeks) were 536 and 1,072 mg/kg-day for males and 386 and 772 mg/kg-day for  
15944 females. The incidence of hepatocellular carcinoma was statistically significantly increased in treated  
15945 male and female mice of both dose groups, compared with controls (males - untreated control: 2/17,  
15946 vehicle control: 2/20, 536 mg/kg-day: 32/49, 1,072 mg/kg-day: 27/48; females - untreated control: 2/20,  
15947 vehicle control: 0/20, 386 mg/kg-day: 19/48, 772 mg/kg-day: 19/48); the time to first tumor was also  
15948 decreased in treated mice (weeks 27-40 in males, weeks 41-50 in females) compared to controls (weeks  
15949 90-91 in males, week 91 in females). Metastasis of hepatocellular carcinomas to the lung was observed  
15950 in 3/49 low-dose males, 1/49 low-dose females, and 1/48 high-dose females.

15951

15952



## Appendix G Chronic Inhalation Risk Estimates Using Occupational HECs

Table\_Apx G-1 presents risk chronic inhalation risk estimates for each OES based on the occupational HECs for neurotoxicity presented in Table 3-8. These HECs are based on 8 hr or 12 hr LOAEC PODs and were compared to 8 or 12 hr TWA exposures for calculating MOEs. Risk estimates are shown without a respirator as well as with APF = 50 for workers, the highest plausible respiratory protection expected to be used by workers on a regular basis. Occupational Exposure Scenarios (OES) that are highlighted in gold demonstrate differing risk conclusions than shown in Section 4.3 (i.e. not using occupational HECs) based either on worker risk estimates with APF = 50 or ONU estimates without a respirator. Of note, occupational HECs were derived based on an expected normal, full time work schedule. For OES where exposure is expected for significantly less than 250 days/year (both of Other DOD uses), these HEC values are likely to overestimate risk.

**Table\_Apx G-1. Chronic Inhalation Risk Estimates by OES**

8 hr HEC = 14.5 ppm 12 hr HEC = 9.7 ppm			Benchmark MOE = 100			
Occupational Exposure Scenario	Occupational HEC (ppm)	Exposure Level	MOEs for Chronic Exposure			Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 50	
Manufacturing (8 hr)	14.5	High-End	5.6	446	278	100
		Central Tendency	446		22308	
Manufacturing (12 hr)	9.7	High-End	46	472	2280	100
		Central Tendency	472		23577	
Repackaging	14.5	High-End	18	33	885	100
		Central Tendency	33		1666	
Processing as a reactant (8hr)	14.5	High-End	5.6	446	278	100
		Central Tendency	446		22308	
Processing as a reactant (12hr)	9.7	High-End	46	472	2280	100
		Central Tendency	472		23577	
Incorporation into Formulation - Aerosol Packing	14.5	High-End	1.1	1.7	55	100
		Central Tendency	1.7		87	
Incorporation into Formulation - Degreasing Solvent	14.5	High-End	5.6	20	279	100
		Central Tendency	20		994	
Incorporation into Formulation - Dry Cleaning Solvent	14.5	High-End	1.0	3.7	51	100
		Central Tendency	3.7		183	

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8 hr HEC = 14.5 ppm 12 hr HEC = 9.7 ppm			Benchmark MOE = 100			
Occupational Exposure Scenario	Occupational HEC (ppm)	Exposure Level	MOEs for Chronic Exposure			Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 50	
Incorporation into Formulation - Miscellaneous	14.5	High-End	10	36	513	100
		Central Tendency	36		1825	
Batch Open-Top Vapor Degreasing	14.5	High-End	0.5	2.8	23	100
		Central Tendency	6.9	24	345	
Batch Closed-Loop Vapor Degreasing	14.5	High-End	57	151	2865	100
		Central Tendency	201	222	10043	
Conveyorized Vapor Degreasing	14.5	High-End	7.80E-2	0.1	3.9	100
		Central Tendency	0.2	0.4	9.3	
Web Degreasing	14.5	High-End	8.0	12	402	100
		Central Tendency	24	45	1187	
Cold Cleaning (Monitoring)	14.5	High-End	3.5	EPA did not identify ONU monitoring data	176	100
		Central Tendency	10		518	
Cold Cleaning (Modeling)	14.5	High-End	9.4	19	472	100
		Central Tendency	6048	11685	302423	
Aerosol Degreasing/Lubricants (Monitoring)	14.5	High-End	1.9	EPA did not identify ONU monitoring data	93	100
		Central Tendency	10		504	
Aerosol Degreasing/Lubricants (Modeling)	14.5	High-End	0.8	20	42	100
		Central Tendency	2.6	145	132	
Dry Cleaning and Spot Cleaning - Post-2006 (Monitoring)	14.5	High-End	0.7	42	37	100
		Central Tendency	4.0	42	199	
Dry Cleaning and Spot Cleaning - Post-2006 (Modeling)	14.5	High-End	0.3	6.2	16	100
		Central Tendency	6.9	89	346	
Dry Cleaning and Spot Cleaning - 4 <sup>th</sup> /5 <sup>th</sup> Gen Only	14.5	High-End	2.6	118	130	100
		Central Tendency	15	1039	741	
Paints/Coatings	14.5	High-End	3.2	62	159	100

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8 hr HEC = 14.5 ppm 12 hr HEC = 9.7 ppm			Benchmark MOE = 100			
Occupational Exposure Scenario	Occupational HEC (ppm)	Exposure Level	MOEs for Chronic Exposure			Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 50	
		Central Tendency	62		3107	
Adhesives	14.5	High-End	18	164	894	100
		Central Tendency	164		8193	
Maskant for Chemical Milling	14.5	High-End	6.9	12	345	100
		Central Tendency	12		598	
Industrial Processing Aid	14.5	High-End	12	242	614	100
		Central Tendency	242		12083	
Metalworking Fluids	14.5	High-End	692	2521	34616	100
		Central Tendency	2521		126038	
Wipe Cleaning and Metal/Stone Polishes	14.5	High-End	6.36E-02	0.6	3.2	100
		Central Tendency	0.1	664	5.5	
Other Spot Cleaning/Spot Removers	14.5	High-End	63	483	3142	100
		Central Tendency	84		4219	
Other Industrial Uses	14.5	High-End	403	1822	20153	100
		Central Tendency	1822		91115	
Other Commercial Uses - Printing	14.5	High-End	2.4	7.6	122	100
		Central Tendency	7.6		378	
Other Commercial Uses - Photocopying	14.5	High-End	29000	77333	1450000	100
		Central Tendency	77333		3866667	
Other Commercial Uses - Photographic Film	14.5	High-End	0.3	2.3	13	100
		Central Tendency	2.3		115	
Other Commercial Uses - Mold Release	14.5	High-End	73	145	3625	100
		Central Tendency	145		7250	
Waste Handling, Disposal, Treatment, Recycling	14.5	High-End	403	1822	20153	100
		Central Tendency	1822		91115	

PEER REVIEW DRAFT. DO NOT CITE OR QUOTE

8 hr HEC = 14.5 ppm 12 hr HEC = 9.7 ppm			Benchmark MOE = 100			
Occupational Exposure Scenario	Occupational HEC (ppm)	Exposure Level	MOEs for Chronic Exposure			Benchmark MOE (= Total UF)
			Worker No respirator	ONU No respirator	Worker APF 50	
Other DOD Uses - Water Pipe Repair	14.5	High-End	6.3	13	314	100
		Central Tendency	13		627	
Other DOD Uses - Oil Analysis	14.5	High-End	16	16	823	
		Central Tendency				

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