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## **Updated Problem Formulation and Protocol for the Inorganic Arsenic IRIS Assessment**

[CASRN 7440-38-2]

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Integrated Risk Information System  
National Center for Environmental Assessment  
Office of Research and Development  
U.S. Environmental Protection Agency  
Washington, DC

## ***Systematic Review Protocol for the Inorganic Arsenic IRIS Assessment***

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## ABBREVIATIONS

ADME	absorption, distribution, metabolism, excretion	HPLC	high-performance liquid chromatography
AOPn	Adverse Outcome Pathway network	HPG	hypothalamic-pituitary-gonadal
AR	androgen receptor	IARC	International Agency for Research on Cancer
As	arsenic	iAs	inorganic arsenic
ATO	arsenic trioxide	ICD	International Classification of Disease
ATRA	all trans-retinoic acid	IHD	ischemic heart disease
ATSDR	Agency for Toxic substances and Disease Registry	IPCS	International Programme on Chemical Safety
BMD	benchmark dose	IRIS	Integrated Risk Information System
BMDL	benchmark dose lower confidence limit	IUR	inhalation unit risk
CAA	Clean Air Act	KEGG	Kyoto Encyclopedia of Genes and Genomes
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act	KO	knockout
CORT	corticosterone	LECs	lung epithelial cells
CVD	cardiovascular disease	LH	luteinizing hormone
CWA	Clean Water Act	LOQ	level of quantitation
DAPK	death-associated protein kinase	MAPKs	mitogen activated protein kinases
DCS	diseases of the circulatory system	MIE	molecular initiating event
DMA	dimethylarsinate	miRNA	microRNA
DMA(V)	dimethylarsinic acid	MMA	monomethylarsonate
DNMTs	altered DNA methyltransferases	MOA	mode of action
DNT	developmental neurotoxicity	MR	mineralocorticoids
E2	estradiol	NA	not applicable
ECD	electrochemical detection	NADPH	nicotinamide adenine dinucleotide phosphate
EFSA	European Food Safety Authority	NCEA	National Center for Environmental Assessment
EPA	Environmental Protection Agency	NF- $\kappa$ B	nuclear factor kappa B
ER	Estrogen receptor	NOEL	no-observed-effect level
ER $\alpha$	estrogen receptor alpha	NRC	National Research Council
ERK	extracellular signal-regulated kinase	NTP	National Toxicology Program
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act	OHAT	Office of Health Assessment and Translation
FSH	follicle-stimulating hormone	OSF	oral slope factor
GD	Gestational Day	PBL	peripheral blood lymphocyte
GI	gastrointestinal	PBMCs	peripheral blood mononuclear cells
GR	glucocorticoid receptor	PBPK	physiologically based pharmacokinetic
GRADE	Grading of Recommendations Assessment, Development and Evaluation	PC	partition coefficient
GREs	glucocorticoid receptor response elements	PECO	populations, exposures, comparators, and outcomes
GSH	glutathione	PND	Postnatal Day
HAP	hazardous air pollutants	PR	progesterone receptor
HCC	hepatocellular carcinoma	PSA	prostate-specific antigen
HEALS	Health Effects of Arsenic Longitudinal Study	RAR	retinoic acid receptor
HELF	embryonic lung fibroblasts	RARE	RAR response element
HERO	Health and Environmental Research Online	RfC	inhalation reference concentration
HPA	hypothalamic-pituitary-adrenal	RfD	oral reference dose
		ROS	reactive oxygen species
		RR	relative risk

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RRB	relative risk to background exposure	TCEQ	Texas Commission on Environmental Quality
RRE <sub>20</sub>	exposure that increases relative risk by 20%	TH	thyroid hormone
SD	standard deviation	TK	toxicokinetics
SAM	S-adenosylmethionine	TR	thyroid hormone receptor
SECs	sinusoidal endothelial cells	TrxR	thioredoxin reductase
SEM	standard error of the mean	U.S.	United States
SMR	standardized mortality ratio	VEGF	vascular endothelial growth factor
SOAR	Systematic Omics Analyses Review	V <sub>max</sub>	maximum velocity
SOD	superoxide dismutase	WT	wild type
		WHO	World Health Organization

## **AUTHORS | CONTRIBUTORS | REVIEWERS**

### **Assessment Team**

---

Janice S. Lee (Co-assessment Manager) U.S. EPA/ORD/NCEA

Allen Davis (Co-assessment Manager)

Ila Cote (Former co-Assessment Manager;  
retired)

Jeff Gift

Ingrid L. Druwe

### **Technical Experts**

---

David Thomas U.S. EPA/ORD/NHEERL

Hisham El-Masri

Thomas Bateson U.S. EPA/ORD/NCEA

Ellen Kirrane

Tom Luben

Andrew Rooney NIEHS/NTP

Lyle Burgoon U.S. Army Corp of Engineers

Lewis Geer National Library of Medicine, Center for Biotechnology  
Information

### **External Reviewers – Dose-Response Methods**

---

Weihshueh Chiu Texas A&M

David Dunson Duke University

Dale Hattis Clark University

Boubakari Ibrahimou Florida International University

Walter Piergorsch University of Arizona

### **Executive Direction**

---

Tina Bahadori NCEA Center Director

Mary Ross NCEA Deputy Center Director

Belinda Hawkins NCEA Associate Director for Health (acting)

Emma Lavoie NCEA Assistant Center Director for Scientific Support

## ***Systematic Review Protocol for the Inorganic Arsenic IRIS Assessment***

Kristina Thayer	NCEA/IRIS Division Director
Samantha Jones	NCEA/Cincinnati Division Director (acting)
James Avery	NCEA/IRIS Deputy Division Director (acting)
Andrew Kraft	NCEA/IRIS Associate Director of Science (acting)

### **Contributors and Production Team**

---

Hillary Hollinger	HERO Librarian
Ryan Jones	HERO Director
Vicki Soto	Project Management Team
Dahnish Shams	Project Management Team
Maureen Johnson	NCEA Webmaster

### **Contractor Support**

---

Robyn Blain	ICF International
Natalie Blanton	
David Burch	
Michelle Cawley	
Susan Goldhaber	
Pamela Hartman	
Cara Henning	
Kevin Hobbie	
Baxter Jones	
Penelope Keller	
William Mendez, Jr.	
Pradeep Rajan	
Pam Ross	
Audrey Turley	
Kan Shao	Indiana University, School of Public Health
Bruce Allen	Allen Consulting, LLC
Ruchir Shah	Sciome, LLC
Jason Pirone	

# 1. INTRODUCTION

1           The Integrated Risk Information System (IRIS) Program is developing an updated  
2 Toxicological Review of Inorganic Arsenic that considers the substantial body of new data and  
3 refined methods for hazard assessment and exposure- and dose-response analysis that have  
4 emerged since the previous Inorganic Arsenic IRIS assessment was published in 1995. Given the  
5 size and complexity of the evidence base for this chemical, input on the scope of this assessment has  
6 been sought from the National Research Council (NRC) of the National Academy of Sciences (NAS),  
7 Environmental Protection Agency (EPA) program and regional offices, other federal agencies, and  
8 public stakeholders (see Table 1-1) to help focus the scope and objectives of the assessment and  
9 ensure it is transparently conducted using the best available scientific data and methods, including  
10 systematic review methodology. This current document summarizes the Agency needs for the  
11 assessment and presents the refined focus based on problem formulation activities conducted since  
12 the last assessment plan released to the NRC in 2015. This document also presents the assessment  
13 protocol, which describes methods already used to prioritize health outcomes as part of refining  
14 the focus, as well as dose-response and other methods that will be used to complete the  
15 assessment. More details on the methods can be found in posters that accompany this protocol  
16 ([http://hero.epa.gov/index.cfm/project/page/project\\_id/2211](http://hero.epa.gov/index.cfm/project/page/project_id/2211)).

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**Table 1-1. Timeline of EPA activities to update the 1995 inorganic arsenic assessment**

<b>History</b>	
1988	EPA published the IRIS Health Hazard Assessment for Inorganic Arsenic.
1991	EPA published a revision to the IRIS RfD.
1995	EPA published a revision to the oral and inhalation cancer assessments.
1999	The National Research Council (NRC), at EPA's request, published the <a href="#">Arsenic in Drinking Water</a> report.
2001	The NRC published <a href="#">Arsenic in Drinking Water 2001 Update</a> .
2003	EPA began updating the 1988 IRIS Toxicological Review.
2005	EPA released the draft IRIS <a href="#">Toxicological Review of Inorganic Arsenic</a> for public comment and external peer review by EPA's Science Advisory Board (SAB).
2007	An expert panel convened by EPA's Science Advisory Board completed a review of key scientific issues included in the draft Toxicological Review and published comments in an advisory report.
2010	EPA released the revised draft <a href="#">IRIS Toxicological Review of Inorganic Arsenic</a> for public comment and external peer review by the SAB.
2010	SAB completed its review of the draft Toxicological Review.
2011	Congress directed EPA to contract with the NRC to review the draft Toxicological Review.
2013 (January)	EPA held a <a href="#">public scoping and problem formulation meeting</a> for refining the draft IRIS Toxicological Review of Inorganic Arsenic.
2013 (March–July)	EPA held eight <a href="#">science issues public webinars</a> .
2013 (May)	EPA submitted a draft Assessment Development Plan and preliminary assessment materials to NRC for review.
2013 (November)	NRC released the interim report, <a href="#">Critical Aspects of EPA's IRIS Assessment of Inorganic Arsenic</a> , and provided recommendations; NRC supported EPA's Assessment Development Plan.
2014 (June)	EPA held a <a href="#">public science meeting</a> to present and solicit comments on the Assessment Development Plan, preliminary assessment materials, and key science issues.
2015 (December)	EPA briefed the NRC committee on a revised draft Assessment Development Plan with updated dose-response approaches.
2019 (May)	EPA released the protocol for the arsenic assessment for public comment and NRC review.

## 2. SCOPING AND PROBLEM FORMULATION SUMMARY

### 2.1. SCOPING SUMMARY

- 1 As part of scoping, the Integrated Risk Information System (IRIS) Program works with EPA  
 2 program offices and regions that have an interest in the assessment to identify their specific needs.  
 3 A summary of the input received from this outreach effort conducted in 2018 for inorganic arsenic  
 4 (iAs) is provided in Table 2-1.

**Table 2-1. EPA program office or region interest in the inorganic arsenic assessment**

EPA program or regional office	Oral	Inhalation	Statutes/regulations and executive orders	Anticipated uses/interest
Office of Land and Emergency Management Regions 1-10	✓	✓	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)  Resource Conservation and Recovery Act (RCRA)	iAs has been identified as a contaminant of concern at numerous contaminated waste sites, including more than a hundred National Priority List (NPL) sites. CERCLA authorizes EPA to conduct short- or long-term cleanups at Superfund sites and later recover cleanup costs from potentially responsible parties under section 107. iAs toxicological information may be used to make risk determinations for response actions (e.g., short-term removals, long-term remedial response actions, RCRA Corrective Action).

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EPA program or regional office	Oral	Inhalation	Statutes/regulations and executive orders	Anticipated uses/interest
Office of Water	✓		Safe Drinking Water Act (SDWA) and Clean Water Act (CWA)	The SDWA requires EPA to periodically review the National Primary Drinking Water Regulation (NPDWR) for each contaminant and revise the regulation, if appropriate. iAs toxicological information may be used to inform risk determinations associated with revisiting the NPDWR. Under the CWA, EPA derives 304(a) recommended ambient water quality criteria for the protection of human health. EPA has an existing 304(a) criteria for arsenic, and updated toxicity information could inform any update to criteria.

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## 2.2. BACKGROUND

1            Inorganic arsenic is a naturally occurring element widely distributed throughout Earth's  
2 crust. In addition to natural sources, industrial activities such as coal combustion and smelting  
3 operations can release inorganic arsenic. Inorganic arsenic is found in water, food, soil, and air.  
4 This prevalence increases the potential for human exposure; therefore, characterizing the human  
5 health impacts of inorganic arsenic exposure is important to Agency stakeholders. As the inorganic  
6 arsenic species found most frequently in the environment, As(III) and As(V) were considered in the  
7 assessment.

8            Oral exposure is the primary route of human environmental exposure to inorganic arsenic,  
9 occurring through dietary intake of arsenic-contaminated food or drinking water, incidental  
10 ingestion of soil or sediments containing arsenic, and in the case of fetuses and infants, through  
11 transplacental and lactational exposures. Inorganic arsenic is found in foods such as meats, poultry,  
12 dairy products and cereal ([IARC, 2009](#)). A portion of the arsenic in foods is found as organic  
13 compounds with covalently bound arsenic that originates from inorganic arsenic in water and/or  
14 soils.

15            For the general population, inhalation of inorganic arsenic from air is not usually a primary  
16 route of exposure. However, inhalation can be the primary route of exposure in occupational  
17 settings, and higher levels of inhalation exposure to inorganic arsenic have been observed in  
18 workers and some residents in areas where there are smelters, mines, and/or arsenical chemical  
19 factories. Previous assessments have reported that cigarette smokers can be exposed up to 10 µg of  
20 arsenic/day ([IARC, 2009](#); [ATSDR, 2007](#)), although levels of arsenic in cigarettes are reported to  
21 have been significantly reduced over the years ([Caruso et al., 2014](#); [Marano et al., 2012](#)).

22            Unlike the environmental exposures, where the health concerns are mainly from oral  
23 exposures, occupational exposures can occur via inhalation and dermal contact. Dermal exposure

1 to inorganic arsenic has been investigated as a route of exposure in occupational settings, but these  
2 dermal exposures are most likely concurrent with inhalation and oral exposure, making it difficult  
3 to determine the effect of dermal exposure alone.

4 The potential for exposure from multiple routes and sources exists, particularly for workers  
5 and populations near work sites. In some work site scenarios (e.g., mining), sensitive populations  
6 such as reproductive-aged men and women have the potential for increased inorganic arsenic  
7 exposure from aggregate exposure at many levels, including exposure from different media within  
8 the oral route, across routes of exposure, and in occupational and nonoccupational settings.

9 The existing IRIS oral reference dose (RfD) for inorganic arsenic is 0.0003 mg/kg-day, based  
10 on hyperpigmentation, keratosis, and possible vascular complications observed in a large number  
11 of adult residents exposed to arsenic in a blackfoot disease-endemic area in southwest Taiwan. An  
12 inhalation reference concentration (RfC) for inorganic arsenic was not derived ([U.S. EPA, 1995](#)).  
13 EPA has concluded that inorganic arsenic is a human carcinogen via both the oral and inhalation  
14 routes of exposure, and cancer risk estimates were calculated. The cancer oral slope factor (OSF)  
15 for inorganic arsenic is 1.5 per mg/kg-day based on skin cancers observed in the large southwest  
16 Taiwanese cohort referenced above ([U.S. EPA, 1995](#)). The cancer inhalation unit risk (IUR) for  
17 inorganic arsenic is 0.0043 per  $\mu\text{g}/\text{m}^3$  based on respiratory cancer mortality observed in a cohort of  
18 Anaconda, MT smelter workers. This inhalation unit risk estimates an increase in cancer risk of  
19 1/1,000,000 cases at an arsenic air concentration of 0.0002  $\mu\text{g}/\text{m}^3$  assuming continuous lifetime  
20 exposure ([U.S. EPA, 1995](#)).

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### 2.3. UPDATED SCOPING AND PROBLEM FORMULATION

21 In December 2011, EPA received direction from Congress, through the Consolidated  
22 Appropriations Act ([U.S. Congress, 2011](#)), to contract with the NRC to conduct a review of EPA's  
23 draft inorganic arsenic assessment considering both cancer and noncancer hazards from oral  
24 exposure. The first phase of the NRC review began in July 2012 and was completed in November  
25 2013. As part of first phase of the NRC review, EPA provided the NRC draft materials for comment.  
26 These draft materials included planning and scoping documents, as well as a draft assessment  
27 development plan outlining proposed approaches for literature searches, literature evaluation,  
28 hazard identification, and mode-of-action (MOA) and dose-response analyses. In accordance with  
29 this Congressional mandate, the NRC provided recommendations to EPA for developing the draft  
30 assessment ([NRC, 2013](#)). The most recent EPA update to the NRC with a draft Assessment Plan  
31 occurred in 2015 ([U.S. EPA, 2015](#)). Major past NRC conclusions and recommendations include:

- 32 • The committee concluded that human data are expected to be the basis for dose-response  
33 analyses but should the epidemiological data in the range of observation be inadequate to  
34 meet EPA's needs, MOA data should be used to the extent possible to extrapolate below the  
35 observed range ([NRC, 2013](#)).

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- 1 • The committee suggested that health outcomes included in the assessment should be tiered  
2 and further prioritized given the volume of data on inorganic arsenic, particularly human  
3 data ([NRC, 2013](#)). The NRC provided recommendations on three tiers of outcomes,  
4 specifically: Tier 1 (evidence of a causal association determined by other agencies and/or in  
5 published reviews), Tier 2 (other priority outcomes), and Tier 3 (other endpoints to  
6 consider).
- 7 • The committee supported EPA's proposal to consider animal and mechanistic data as  
8 supporting evidence for determining causality ([NRC, 2013](#)).
- 9 • The committee agreed with EPA's proposal to conduct dose-response analysis for *causal* or  
10 *likely causal* relationships, even in the absence of understanding the potential  
11 mode(s)-of-action ([NRC, 2013](#)).
- 12 • The committee supported EPA's plan to conduct feasibility analyses to determine whether  
13 the available MOA evidence is expected to be useful for informing the dose-response of  
14 health outcomes classified as having a *causal* or *likely causal* relationship with arsenic ([NRC,  
15 2013](#)).
- 16 • The committee supported EPA's dose-response meta-analysis approach for epidemiological  
17 studies ([NRC, 2013](#)).
- 18 • The committee agreed with use of the physiologically-based pharmacokinetic (PBPK) model  
19 by [El-Masri and Kenyon \(2008\)](#) to understand the relationship between drinking water and  
20 urinary concentrations of arsenic, as presented to the NRC in 2015  
21 (<https://www.epa.gov/iris/inorganic-arsenic-meetings-webinars>).

22 The current document presents adjustments to the 2015 Assessment Plan to further clarify  
23 the scope of the assessment and describe assessment methods, both systematic review methods  
24 implemented already to prioritize health outcomes as part of refining the focus as well as  
25 dose-response and other methods that will be used to complete the assessment. The refined scope  
26 presented here was informed by prior science discussions with the NRC, EPA program and regional  
27 offices, and other stakeholders.

### 2.3.1. Prioritizing Health Outcomes for Dose-Response Analysis

28 Hundreds of epidemiological studies on the toxicity of inorganic arsenic have been  
29 published for a broad range of cancer and noncancer outcomes, including large-scale longitudinal  
30 cohort studies, case-control studies, and cross-sectional studies. Given this abundance of  
31 epidemiological evidence and preference for using human data over animal data when available,  
32 human data are expected to be the basis for dose-response analyses ([NRC, 2013](#)). With respect to  
33 the animal data, most adult laboratory animal models appear to be less susceptible to inorganic  
34 arsenic than humans when comparative information is available ([Lynch et al., 2017a, b](#); [Vahter,  
35 1994](#); [Vahter and Norin, 1980](#)). Interspecies metabolism differences likely explain the differences  
36 in toxicity between animals and humans, with animals requiring higher doses to reach internal

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1 doses comparable to those observed in humans. Another potential confounder in animal studies is  
2 the high levels of dietary arsenic found in standard laboratory chow ([Kozul et al., 2008](#)). Thus,  
3 analysis of the epidemiological evidence base has been the basis for prioritizing health outcomes  
4 for dose-response analysis as described below. Animal and mechanistic evidence has been  
5 considered as supplemental evidence in the EPA assessment, an approach supported by the NRC  
6 ([NRC, 2013](#)) and consistent with assessments by others ([TCEQ, 2017](#); [EFSA, 2009](#); [ATSDR, 2007](#)).  
7 The abundance of epidemiological evidence also focuses the cancer mode-of-action analyses of  
8 mechanistic evidence to targeted questions of understanding the shape of the dose-response  
9 relationship rather than broader questions of applicability of tumor findings in animals to humans  
10 (see §2.3.2).

11 In its 2013 interim report, the NRC categorized several health outcomes into three tiers of  
12 outcomes (see Table 2-2), specifically: Tier 1 (evidence of a causal association determined by other  
13 agencies and/or in published reviews), Tier 2 (other priority outcomes), and Tier 3 (other  
14 endpoints to consider). NRC advised EPA to further refine these categorizations after conducting a  
15 more comprehensive analysis. As part of this further refinement, EPA conducted hazard analyses in  
16 2015–2016 that considered the strength of the epidemiological evidence for each health outcome,  
17 either by relying on conclusions from other assessments or by conducting new systematic reviews  
18 of the literature. The strength of the evidence base for these health outcomes was characterized by  
19 EPA into *robust*, *moderate*, or *slight* categories (see Table 2-2). The methods used to conduct these  
20 systematic reviews are described in Section 3, and the results are summarized below in Table 2-2.  
21 The results of the systematic reviews and hazard analyses will be included in the inorganic arsenic  
22 assessment and subject to external peer review (or cited, if published in the peer review literature).  
23 Briefly, these categories are characterizations for judgments on the extent of support provided by  
24 human studies that the health effect(s) result from chemical exposure. Repeated observations of  
25 associations by independent studies examining various aspects of exposure or response (e.g.,  
26 across different exposure settings, dose levels or patterns, populations, and related endpoints)  
27 result in a stronger strength of evidence judgement. These terms are differentiated by the quantity  
28 and quality of information available to rule out alternative explanations for the results.

29 Based on those qualitative hazard analyses of the inorganic arsenic literature, the following  
30 health outcomes were identified for potential dose-response analyses consideration in the  
31 assessment based on a determination of *robust* or *moderate* evidence (see Table 2-2). These  
32 outcomes include cancers of the bladder, lung, kidney, liver, and skin; and noncancer effects of  
33 inorganic arsenic on the circulatory system (ischemic heart disease, hypertension, and stroke),  
34 reproductive system (including pregnancy and birth outcomes), developmental outcomes  
35 (including neurodevelopmental toxicity), endocrine system (including diabetes), immune system,  
36 respiratory system, and skin. Health outcomes with “slight” evidence (prostate and pancreatic  
37 cancer and renal disease) were not further considered for dose-response. These health outcomes  
38 generally aligned with those categorized by the NRC as Tier 1 (causal) or Tier 2 (other priority),

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1 except for prostate cancer, which was considered Tier 2 by NRC but *slight* based on the 2015–2018  
2 analyses conducted by EPA.

3 As described in Chapter 5, the selection of specific studies and data sets for use in  
4 dose-response analyses takes into consideration existing EPA guidance and support documents,  
5 especially EPA’s *Benchmark Dose Technical Guidance* ([U.S. EPA, 2012](#)), EPA’s *Review of the Reference*  
6 *Dose and Reference Concentration Processes* ([U.S. EPA, 2002b](#)), *Guidelines for Carcinogen Risk*  
7 *Assessment* ([U.S. EPA, 2005a](#)), and *Supplemental Guidance for Assessing Susceptibility from Early-Life*  
8 *Exposure to Carcinogens* ([U.S. EPA, 2005b](#)).

**Table 2-2. Strength of evidence judgements to help prioritize health outcomes of concern for EPA's inorganic arsenic assessment**

Health outcome	NRC tier ( <a href="#">NRC, 2013</a> )	EPA strength-of-evidence judgement of human evidence of a causal association
<b>NRC Tiers: Tier 1: Evidence of causality; Tier 2: Other priority outcome; Tier 3: Other endpoints to consider</b>		
Lung cancer	Tier 1	<b>Robust.</b> Based on NRC Tier 1 and conclusions of “carcinogenic” for lung cancer from other assessments ( <a href="#">ATSDR, 2016</a> ; <a href="#">NTP, 2016</a> ; <a href="#">IARC, 2012</a> ; <a href="#">WHO, 2011a, b</a> ; <a href="#">ATSDR, 2007</a> ; <a href="#">IARC, 2004b</a> ).
Bladder cancer	Tier 1	<b>Robust.</b> Based on NRC Tier 1 and conclusions of “carcinogenic” for bladder cancer from other assessments or review articles ( <a href="#">ATSDR, 2016</a> ; <a href="#">NTP, 2016</a> ; <a href="#">IARC, 2012</a> ; <a href="#">WHO, 2011a, b</a> ; <a href="#">ATSDR, 2007</a> ; <a href="#">IARC, 2004b</a> ).
Skin cancer	Tier 1	<b>Robust.</b> Based on 1995 EPA conclusion of “known carcinogen” based on skin cancer ( <a href="#">U.S. EPA, 1995</a> ), NRC Tier 1, and conclusions of “carcinogenic” for skin cancer based on other assessments ( <a href="#">ATSDR, 2016</a> ; <a href="#">NTP, 2016</a> ; <a href="#">IARC, 2012</a> ; <a href="#">WHO, 2011a, b</a> ; <a href="#">ATSDR, 2007</a> ).
Ischemic heart disease	Tier 1	<b>Robust.</b> Based on systematic review conducted by EPA on diseases of the circulatory system (ischemic heart disease and hypertension/stroke), which is similar to associations noted in other assessments ( <a href="#">ATSDR, 2016</a> ; <a href="#">WHO, 2011a, b</a> ; <a href="#">ATSDR, 2007</a> ) and meta-analysis <sup>a</sup> ( <a href="#">Moon et al., 2017a, b</a> ; <a href="#">Moon et al., 2013</a> ).
Skin lesions	Tier 1	<b>Robust.</b> Based on NRC Tier 1 and conclusions from other assessments ( <a href="#">ATSDR, 2016</a> ; <a href="#">WHO, 2011a, b</a> ; <a href="#">ATSDR, 2007</a> ).
Diabetes	Tier 2	<b>Robust.</b> Based on systematic review conducted by EPA, which is similar to associations noted in <a href="#">ATSDR (2016)</a> , an expert review conducted as part of an NTP workshop ( <a href="#">Maull et al., 2012</a> ; <a href="#">Thayer et al., 2012</a> ) and a meta-analysis <sup>a</sup> ( <a href="#">Wang et al., 2014</a> ).
Pregnancy outcomes (fetal and infant morbidity)	Tier 2	<b>Robust.</b> Based on systematic review conducted by EPA on pregnancy and birth outcomes (fetal growth, prematurity, and infant growth in the first 5 yr of life), which is similar to associations noted in <a href="#">ATSDR (2016)</a> and meta-analysis <sup>a</sup> by <a href="#">Quansah et al. (2015)</a> .
Pregnancy outcomes (fetal loss, stillbirth, and neonatal mortality)	Tier 3	<b>Robust.</b> Based on systematic review conducted by EPA on pregnancy and birth outcomes (fetal loss and infant mortality in the first 5 yr of life), which is similar to associations noted in <a href="#">ATSDR (2016)</a> , review by <a href="#">Bloom et al. (2010)</a> , and a meta-analysis <sup>a</sup> by <a href="#">Quansah et al. (2015)</a> .
Hypertension/stroke <sup>b</sup>	Tier 3	<b>Robust.</b> Based on systematic review conducted by EPA on diseases of the circulatory system (including ischemic heart disease and hypertension/stroke), which is similar to associations noted in <a href="#">ATSDR (2016)</a> , review by <a href="#">Abhyankar et al. (2012)</a> , and meta-analysis <sup>a</sup> ( <a href="#">Moon et al., 2017a, b</a> ; <a href="#">Moon et al., 2013</a> ).

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Health outcome	NRC tier ( <a href="#">NRC, 2013</a> )	EPA strength-of-evidence judgement of human evidence of a causal association
Renal cancer	Tier 2	<b>Moderate.</b> Based on systematic review conducted by EPA, which is similar to associations noted in <a href="#">IARC (2012, 2004b)</a> and <a href="#">ATSDR (2016)</a> .
Nonmalignant respiratory disease	Tier 2	<b>Moderate.</b> Based on systematic review conducted by EPA, which is similar to associations noted in <a href="#">ATSDR (2016)</a> .
Neurodevelopmental toxicity	Tier 2	<b>Moderate.</b> Based on systematic review conducted by EPA, which is similar to associations noted in <a href="#">ATSDR (2016)</a> .
Immune effects	Tier 2	<b>Moderate.</b> Based on systematic review conducted by EPA, which is similar to associations noted in <a href="#">ATSDR (2016)</a> .
Liver cancer	Tier 3	<b>Moderate.</b> Based on systematic review conducted by EPA, which is similar to associations noted in <a href="#">IARC (2012, 2004b)</a> .
<b>Health outcomes considered to have <i>slight</i> evidence</b>		
Prostate cancer	Tier 2	<b>Slight.</b> Based on systematic review conducted by EPA, which is similar to associations noted in <a href="#">IARC (2012, 2004b)</a> .
Pancreatic cancer	Tier 3	<b>Slight.</b> Based on systematic review conducted by EPA and associations noted in <a href="#">IARC (2004b)</a> .
Renal disease	Tier 3	<b>Slight.</b> Based on systematic review conducted by EPA.

<sup>a</sup>In cases of Tier 2 or 3 health outcomes, the results and conclusions of systematic reviews conducted by EPA formed the primary rationale for identifying a health outcome as having robust, moderate, or slight strength of evidence. For health outcomes that also had meta-analyses conducted by outside groups, the meta-analyses are considered supplemental information. Relevant primary studies included in the meta-analyses were considered in the systematic reviews conducted by EPA.

<sup>b</sup>These outcomes considered along with the larger ischemic heart disease database; the strength of the epidemiologic database was based on the full set of all studies for all endpoints.

### **2.3.2. Mode-of-Action Analyses**

1 EPA Cancer Guidelines ([U.S. EPA, 2005a](#)) discuss the use of an MOA framework as an  
2 analytic tool to evaluate the mechanistic evidence for carcinogenicity or any toxicity within  
3 hypothesized MOAs. The Cancer Guidelines state that such analyses are used “to address the  
4 question of human relevance of animal tumor responses; to address differences in anticipated  
5 response among humans, such as between children and adults or men and women; and as the basis  
6 of decisions about the anticipated shape of the dose response relationship” ([U.S. EPA, 2005a](#)).

7 The EPA Cancer Guideline recommendations for MOA analyses are typically applied for  
8 chemicals for which human evidence is insufficient or human relevance needs to be established.  
9 Inorganic arsenic, a known human carcinogen, is a chemical with a large amount of epidemiological  
10 evidence of carcinogenesis resulting from exposure. The carcinogenic risk to humans has been  
11 established by numerous government agencies, including the World Health Organization (WHO)  
12 International Agency for Research on Cancer (IARC), which identifies inorganic arsenic as a Group 1  
13 carcinogen: “a compound carcinogenic to humans” ([IARC, 2012](#)). With respect to the Cancer  
14 Guidelines and [NRC \(2013\)](#) recommendations regarding interhuman variability, extensive  
15 information on risk modifiers in numerous epidemiological studies of inorganic arsenic are  
16 available, so a MOA analysis to address potential differences in response across human populations  
17 was not considered essential. Thus, it is expected that such analyses can be conducted using  
18 information from the available epidemiological studies.

19 With respect to using MOA and mechanistic data to inform dose-response, EPA conducted a  
20 significant amount of analyses of mechanistic information (see Appendix A), and a case study using  
21 idiopathic bladder cancer was undertaken to address the feasibility of using this information to  
22 inform dose-response modeling with respect to the shape of the curve, particularly in the low-dose  
23 region. Idiopathic bladder cancer was selected for the case study given the abundance of  
24 mechanistic data available for use in conducting the MOA analysis. The results of the literature  
25 review presented in Appendix A and case study were interpreted in the context of whether these  
26 analyses provided a firmer basis for reaching conclusions about the shape of the dose-response  
27 curve in the low-dose region compared with using the multiple epidemiological studies available  
28 that directly assess the effects of low-dose arsenic exposures in various U.S. populations.  
29 Ultimately, the MOA analyses were not considered more suitable than the epidemiological studies.  
30 This reliance on the epidemiological studies for use in dose-response analysis is similar to the  
31 recent meta-regression analysis of arsenic epidemiology studies conducted by [TCEQ \(2017\)](#) and  
32 [Lynch et al. \(2017a, 2017b\)](#), and is consistent with the focus on epidemiology studies in earlier  
33 assessments ([OEHHA, 2014](#); [EFSA, 2009](#); [ATSDR, 2007](#); [U.S. EPA, 2007](#); [Health Canada, 2006](#); [FDA,](#)  
34 [2005](#); [NIOSH, 2005](#); [OSHA, 2005](#); [IARC, 2004a](#); [U.S. EPA, 2004, 2002a](#); [RIVM, 2001](#)).

35 The major challenge in using MOA analyses to reach conclusions about shape of the  
36 dose-response relationship is that mechanisms of arsenic-associated disease induction are complex,  
37 inter-related, differentially applicable to the cancer and noncancer outcomes under consideration,

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1 and likely interoperable in different ways across the concentration ranges tested. There is little  
2 evidence that directly addresses this complexity in the low-dose region. Moreover, much of the  
3 primary evidence is based on in vitro studies conducted at high concentrations (see Appendix A),  
4 raising concerns about applicability to low-dose effects. In other cases, mechanistic evidence comes  
5 from rodent studies; these animals are, in general, considered less susceptible to inorganic arsenic  
6 than humans. The MOA analysis for bladder cancer supported findings from epidemiological  
7 studies on risk modifiers (i.e., smoking, genetic polymorphisms, methylation capacity) that may  
8 affect the risk of arsenic associated bladder cancer. However, while the MOA evaluation provided  
9 additional support by identifying arsenic-specific mechanisms and risk modifiers likely to increase  
10 the risk of human bladder cancer, it is uncertain how this information might be used to inform the  
11 quantitative dose-response analysis. Conducting a similar analysis for other prioritized outcomes is  
12 hindered by the lack of a complete MOA for any health outcome and the likelihood that most, if not  
13 all, health outcomes associated with arsenic exposure involve multiple interactive MOAs. These  
14 challenges have been long recognized, and the NRC acknowledged uncertainty about whether such  
15 analyses would be feasible without further research ([NRC, 2013](#)).

16 Concern over not using MOA analyses in dose-response analysis is offset by both the  
17 abundance of epidemiological studies of low level exposures to arsenic and the increased power  
18 and confidence in low-dose extrapolations afforded by new developments in Bayesian meta-  
19 regression methods that combine data from multiple studies into a single analysis. The hierarchical  
20 Bayesian method allows for the analysis of case-control and cohort studies, as well as low- and  
21 high-dose studies, simultaneously. In addition, this approach makes no assumption on the shape of  
22 the dose-response curve (i.e., linear vs. nonlinear) or whether a threshold exists, except that it does  
23 not allow for a change in the dose-response direction (e.g., a “J”-shaped dose-response curve). In  
24 selecting studies for inclusion in these meta-analyses, priority will be given to studies with  
25 well-characterized exposures during all life stages, including early life (e.g., pregnancy). Finally,  
26 Bayesian meta-regression methods are in line with the 2005 EPA Cancer Guidelines, which  
27 recommends that “when several studies are available for dose-response analysis, meta-analysis can  
28 provide a systematic approach to weighing positive studies and those studies that do not show  
29 positive results, and calculating an overall risk estimate with greater precision.” Additional details  
30 on the Bayesian meta-regression analysis are summarized below in Section 5.

31 The proposed approach for dose-response analysis in the iAs assessment is consistent with  
32 the 2005 EPA Cancer Guidelines two-step approach to distinguish analysis of the dose-response  
33 data from inferences made about lower doses: the first step involves analyses in the range of  
34 observations made in the experimental and epidemiological studies and the second step involves  
35 extrapolation into the lower dose range, taking into consideration what is known about the agents’  
36 MOA ([U.S. EPA, 2005a](#)). However, for iAs, the second extrapolation step is not needed because EPA  
37 is modeling human data, and the lower range of exposures reported in the epidemiological studies  
38 are very near U.S. background exposure levels.

## 3. SYSTEMATIC REVIEW METHODS USED TO PRIOTIZE HEALTH OUTCOMES FOR DOSE-RESPONSE ANALYSIS

### 3.1. SPECIFIC AIMS

- 1 • Identified epidemiological (i.e., human) studies reporting effects of exposure to inorganic  
2 arsenic, focusing on the health outcomes suggested by the National Research Council ([NRC,](#)  
3 [2013](#)):
  - 4 ◦ Tier 1: Bladder cancer, lung cancer, skin cancer, skin lesions, ischemic heart disease.
  - 5 ◦ Tier 2: Diabetes, birth weight, neurodevelopmental effects, immune effects, renal  
6 cancer, prostate cancer, nonmalignant respiratory disease.
  - 7 ◦ Tier 3: Hypertension, stroke, fetal loss/stillbirth/neonatal mortality, liver cancer,  
8 pancreatic cancer, renal disease.
- 9 • Conducted study evaluations (risk of bias) for individual studies according to the National  
10 Toxicology Program (NTP) Office of Health Assessment and Translation (OHAT) approach  
11 ([NTP, 2013](#)), with some assessment-specific clarifications. Studies classified as low quality  
12 or uninformative were not considered further for dose-response analysis.
- 13 • Extracted data on relevant health outcomes from epidemiological studies.
- 14 • For each health outcome specified above, expressed strength-of-evidence synthesis  
15 conclusions across epidemiology studies (or subsets of studies) by relying on conclusions  
16 from other assessments, conducting new systematic review evidence synthesis analysis, or  
17 by a combination of both.
  - 18 ◦ Because bladder, lung, and skin cancer are accepted hazards of inorganic arsenic  
19 exposure ([ATSDR, 2016](#); [NTP, 2016](#); [IARC, 2012](#); [WHO, 2011a, b](#); [ATSDR, 2007](#); [IARC,](#)  
20 [2004b](#)), the strength of evidence for these health outcomes was considered *robust*, and  
21 no new evidence synthesis was conducted by EPA. The assessment will focus on studies  
22 for these outcomes considered suitable for dose-response analysis.
  - 23 ◦ For the other health outcomes listed above, new systematic review evidence synthesis  
24 analysis was conducted to characterize the strength of evidence for potential hazard.

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### 3.2. POPULATIONS, EXPOSURES, COMPARATORS, AND OUTCOMES (PECO)

1 A populations, exposures, comparators, and outcomes (PECO; see Table 3-1) was used as an  
2 aid to focus the research question(s) search terms and to guide study inclusion/exclusion criteria  
3 during literature screening. Changes in the PECO over time are reflected in the Table 3-1. The  
4 PECO for inorganic arsenic was based on a review of the evidence and recommendations presented  
5 in the 2013 National Research Council *Critical Aspects of EPA's Integrated Risk Information System*  
6 *Assessment of Inorganic Arsenic* ([NRC, 2013](#)) and focused on epidemiological evidence only.

7 The PECO criteria used to identify relevant studies evolved over time to reflect problem  
8 formulation activities, including NRC consultations, that narrowed the focus of the assessment.

- 9 • 2012–2013 screening: Broad problem formulation screening to include tracking of  
10 epidemiological, animal, and mechanistic evidence with no restriction on type of health  
11 outcome (both cancer and noncancer).
- 12 • Post-2013 screening: Based on the 2013 NRC consultation, screening efforts focused on  
13 outcomes classified by the NRC as Tier 1, 2, or 3 (cancers of the bladder, lung, skin, kidney,  
14 liver, prostate, pancreas; skin lesions; or noncancer effects of the circulatory system;  
15 pregnancy and birth outcomes; neurodevelopmental effects; diabetes; immune system;  
16 respiratory disease [nonmalignant]; or renal disease).
- 17 • Post-2017 screening: Based on the post-2013 problem formulation activities, screening  
18 efforts have focused on health outcomes with *robust* or *moderate* evidence (see Table 2-2).  
19 These outcomes include cancers of the bladder, lung, kidney, liver, and skin; and noncancer  
20 effects of inorganic arsenic on the circulatory system (ischemic heart disease, hypertension,  
21 and stroke), reproductive system (including pregnancy and birth outcomes), developmental  
22 outcomes (including neurodevelopmental toxicity), endocrine system (including diabetes),  
23 immune system, respiratory system, and skin. The broad search strategy presented in  
24 Section 3.3 was refined to focus on human studies and outcomes of interest by using a filter  
25 available in SWIFT-Review software (filtered by health outcomes and human evidence  
26 stream). Screening for relevance was then conducted in SWIFT-Active software. Any  
27 animal or mechanistic study identified using this narrowed search strategy was tagged as  
28 supplemental material.

29

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**Table 3-1. Populations, exposures, comparators, and outcomes (PECO)**

PECO element	Evidence
Populations	<p>2012–2013: This assessment focused on human studies and considered animal and mechanistic studies (<a href="#">U.S. EPA, 2014</a>). Animal studies may provide supporting evidence for hazard identification. If health effects are reported exclusively in animal studies, mechanistic data will be used to determine human relevance of these effects. Animal and mechanistic studies may also inform susceptibility and dose-response.</p> <p>Post-2013: This assessment focused on human studies and considered animal and mechanistic studies (<a href="#">U.S. EPA, 2015</a>). Animal studies may provide supporting evidence for hazard identification. Animal and AOPn information may also inform susceptibility and dose-response.</p> <p>Post-2017: This assessment focuses on human studies only to include any population and life stage (occupational or general population, including children and other sensitive life stages or populations).</p>
Exposures	<p>Subchronic- or chronic-duration studies of interest provide quantitative estimates of exposure with measurements based on biomonitoring data (e.g., hair, nails, urine, or blood), inhalation (air exposures [<math>\mu\text{g}/\text{m}^3</math>]), drinking water exposures (<math>\mu\text{g}/\text{L}</math>), cumulative exposures (<math>\mu\text{g}/\text{m}^3\text{-yr}</math>; <math>\mu\text{g}/\text{L}/\text{-yr}</math>), and doses expressed as <math>\mu\text{g}/\text{d}</math> and <math>\mu\text{g}/\text{kg}\text{-d}</math>. Studies with episodic or acute exposures will be excluded (i.e., poisonings or other short-term exposures that last up to 30 d).</p> <p>Studies using arsenicals, primarily arsenic trioxide and Fowler’s solution will be excluded because chemotherapeutic agents are not within the scope of this review. Studies using arsenide (<math>\text{As}^{3-}</math>), an inorganic form of arsenic, also will be excluded. Exposures usually occur via the gas arsine and result in a different, distinctive toxicological profile based on binding to hemoglobin and red blood cell lysis.</p>
Comparators	<p>A comparison or reference population with no detectable exposure or exposure to lower levels of inorganic arsenic. Exposure-response quantitative results are presented in sufficient detail (e.g., odds ratios or relative risks with associated confidence intervals, numbers of cases/controls, etc.).</p>
Outcomes	<p>2012–2013 broad problem formulation screening: All health outcomes (both cancer and noncancer) (<a href="#">U.S. EPA, 2014</a>).</p> <p>Post-2013 screening to focus on outcomes classified by the NRC as Tier 1, 2, or 3: Cancers of the bladder, lung, skin, kidney, liver, prostate, pancreas; skin lesions; or noncancer effects of the circulatory system; pregnancy and birth outcomes; neurodevelopmental effects; diabetes; immune system; respiratory disease (nonmalignant); or renal disease (<a href="#">U.S. EPA, 1995</a>).</p> <p>Post-2017 screening of health outcomes prioritized for inclusion in the assessment: cancers of the bladder, lung, kidney, liver, and skin; noncancer effect of inorganic arsenic on the circulatory system (ischemic heart disease, hypertension, and stroke), reproductive system (including pregnancy and birth outcomes), developmental outcomes (including neurodevelopmental toxicity), endocrine system (including diabetes), immune system, respiratory system, and skin</p> <p>Note: A broad outcome search strategy was retained during the different phases of outcome prioritization. Epidemiological studies on other health outcomes not prioritized are tagged during screening to monitor for new studies that may affect the problem formulation decisions described above.</p>
PBPK models	<p>Studies describing PBPK models for inorganic arsenic will be included. Studies describing quantitative models or data for understanding kinetics in biological media will be tracked as “potentially relevant supplemental material.”</p>

AOPn = Adverse Outcome Pathway network; PBPK = physiologically based pharmacokinetic.

Note: Animal and mechanistic data are considered supplemental material and not tracked as PECO relevant.

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### **3.3. LITERATURE SEARCH STRATEGIES**

1 Literature search strategies were originally developed using key words related to  
2 identifying relevant forms of arsenic, without restriction of type of evidence (human, animal,  
3 mechanistic) or type of health outcome. Development of the search strategy for each topic area was  
4 conducted by identifying relevant search terms by (1) reviewing PubMed’s Medical Subject  
5 Headings (MeSH) for relevant and appropriate terms, (2) extracting key terminology from relevant  
6 reviews and a set of previously identified primary data studies that are known to be relevant to the  
7 topic (“test set”), and (3) reviewing search strategies presented in other reviews. Broad search  
8 terms were used to collect references from PubMed, Web of Science, and Toxline. The search  
9 strategy was run, and the results were assessed to ensure that previously identified relevant  
10 primary studies were retrieved. Because each database has its own search architecture, the  
11 resulting search strategy was tailored to account for each database’s unique search functionality.

12 Searches were not restricted by publication date or language. Literature searching was  
13 conducted by EPA’s Health and Environmental Research Online (HERO) staff and stored in the  
14 HERO database.<sup>1</sup> The literature search will be updated during the assessment to identify literature  
15 published during the review. The last literature search update will occur within a year before the  
16 planned release of the draft document for public comment and peer review.

17 The IRIS Program takes extra steps to ensure identification of pertinent studies by  
18 encouraging the scientific community and the public to identify additional studies and ongoing  
19 research; by searching for data submitted under the Toxic Substances Control Act or the Federal  
20 Insecticide, Fungicide, and Rodenticide Act; and by considering recent studies that would impact  
21 the credibility of the conclusions, even during the review process.<sup>2</sup> Studies identified after peer  
22 review begins will only be considered for inclusion if they are directly applicable to the PECO  
23 eligibility criteria and fundamentally alter the assessment’s conclusions.

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### **3.4. USE OF MACHINE LEARNING TO PRIORITIZE STUDIES FOR SCREENING**

24 Following the original literature search in December 2012, the references were clustered  
25 into groups based on language similarity (i.e., natural language processing) using OmniViz  
26 reference visualization software (Instem, Staffordshire, United Kingdom). This supervised  
27 clustering methodology is further described in [Varghese et al. \(2017\)](#). The initial literature search  
28 was designed to be comprehensive and not miss potentially relevant studies; clustering helped to  
29 more efficiently identify those references most likely to contain data relevant to hazard  
30 identification. Approximately 900 additional references were used as “seeds”; these “seed”  
31 references are studies (both human and animal) previously identified as relevant to hazard

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<sup>1</sup>Health and Environmental Research Online: <https://hero.epa.gov/hero/>.

<sup>2</sup>IRIS “stopping rules”:

[https://www.epa.gov/sites/production/files/2014-06/documents/iris\\_stoppingrules.pdf](https://www.epa.gov/sites/production/files/2014-06/documents/iris_stoppingrules.pdf).

1 identification in peer-reviewed arsenic human health risk assessments published by government  
2 agencies ([IARC, 2012](#); [ATSDR, 2007](#); [Health Canada, 2006](#); [IARC, 2004b](#); [NRC, 1999](#)). The “seeds”  
3 and literature search results were combined, and the titles and abstracts of the references were  
4 grouped based on similarity using natural language processing. Reference clusters containing one  
5 or more of the “seed” references were selected to create the health effects cluster of  
6 3,715 references that were then manually screened for relevance. These 3,715 references moved  
7 through the steps described in the following sections to determine their relevance to hazard  
8 identification. References identified after the initial 2012 literature search were screened manually  
9 and computerized clustering was not applied. The last literature search update was conducted in  
10 June 2018.

11 As mentioned above, the PECO criteria used to identify relevant studies evolved over time  
12 to reflect problem formulation activities, including NRC consultations, that narrowed the focus of  
13 the assessment. The broad outcome search strategy was retained during the different phases of  
14 outcome prioritization. Epidemiological studies on other health outcomes not prioritized were  
15 tagged during screening to monitor for new studies that may affect the problem formulation  
16 decisions described above.

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### **3.5. NON-PEER-REVIEWED DATA**

17 IRIS assessments rely mainly on publicly accessible, peer-reviewed studies. However, it is  
18 possible that gray literature (i.e., not reported in the peer-reviewed literature) directly relevant to  
19 the PECO may be identified (e.g., dissertations, etc.) during assessment development. Should such  
20 studies substantially affect assessment decisions or conclusions (i.e., potential to affect PECO  
21 statement, hazard conclusions, or dose-response analysis), EPA can obtain external peer review if  
22 the owners of the data are willing to have the study details and results made publicly accessible.  
23 This independent, contractor-driven peer review would include an evaluation of the study like that  
24 done for a peer-reviewed journal article. The contractor would identify and select two to three  
25 scientists knowledgeable in scientific disciplines relevant to the topic as potential peer reviewers.  
26 Those selected would be screened for conflict of interest prior to confirming their service. In most  
27 instances, the peer review would be conducted by letter. The study authors would be informed of  
28 the outcome of the peer review and given an opportunity to clarify issues or provide missing  
29 details. The study and its related information, if used in the IRIS assessment, would become  
30 publicly available. In the assessment, EPA would acknowledge that the document underwent  
31 external peer review managed by the EPA, and the names of the peer reviewers would be identified.

32 Unpublished (e.g., raw) data from personal author communication can supplement a  
33 peer-reviewed study if the information is made publicly available (typically through documentation  
34 in HERO).

### **3.6. SCREENING PROCESS**

1           The 3,715 studies identified from reference clustering and the additional references  
2 identified after the initial 2012 literature search were manually screened for applicability to PECO.  
3 Studies that comply with the criteria specified in the PECO (see Table 3-1) are considered eligible  
4 for inclusion, while those that do not meet these criteria will be excluded. In addition to these  
5 criteria, the exclusion criteria noted below are applied.

- 6           • Records that do not contain original data, such as scientific literature reviews, editorials, or  
7           commentaries. Although not considered PECO relevant, these studies are tracked during  
8           screening as potentially relevant supplemental materials.
- 9           • Records considered potentially relevant supplemental materials. Although not considered  
10           directly PECO relevant, these studies are tracked during the screening process as described  
11           below.
- 12           • Non-peer-reviewed studies with original data (e.g., abstracts, posters, dissertations).
- 13           • Retracted studies.

14           References were moved through the steps described below to determine their relevance to  
15 hazard identification. Following a pilot phase to calibrate screening guidance, two screeners  
16 independently conducted a title and abstract screen of the search results using a structured form in  
17 DRAGON<sup>3</sup> online to identify records that appeared to meet the PECO eligibility criteria. Records  
18 that were not excluded based on the title and abstract advanced to full-text review. Screening  
19 conflicts were resolved by discussion among the primary screeners with consultation by a third  
20 reviewer or technical advisor (if needed) to resolve any remaining disagreements. Assessment of  
21 eligibility status of non-English studies was facilitated using Google Translate for abstracts and, if  
22 needed, native-language speakers at the EPA.

23           Many informative studies important to consider in the assessment do not meet the PECO  
24 but nevertheless need to be tracked during screening as potentially relevant to the research  
25 question(s). Such studies can include information on ADME; exposure characteristics; population  
26 demographics; nonmammalian model systems; human or animal cells, tissues, or biochemical  
27 reactions with in vitro exposure regimens; bioinformatics pathways of disease analysis; or  
28 high-throughput screening data. These studies will be categorized (i.e., tagged) during the title and  
29 abstract screening process as “potentially relevant supplemental material.”

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<sup>3</sup>DRAGON is an online tool for systematic review developed by ICF. DRAGON stores qualitative and quantitative data for purposes of problem formulation, literature screening, risk-of-bias evaluation, and data integration.

1 Records that are not excluded based on the title and abstract advanced to full-text review.  
2 Full-text copies of potentially relevant records identified from title and abstract screening are  
3 retrieved, stored in the HERO database, and independently assessed by two screeners to confirm  
4 eligibility according to the PECO criteria. Screening conflicts are resolved by discussion among the  
5 primary screeners with consultation by a third reviewer or technical advisor (as needed) to resolve  
6 any remaining disagreements.

7 The included and excluded studies are posted on the project page for this assessment in the  
8 HERO database [http://hero.epa.gov/index.cfm/project/page/project\\_id/2211](http://hero.epa.gov/index.cfm/project/page/project_id/2211).

### **3.6.1. Multiple Publications of the Same Data**

9 When multiple publications use the same or overlapping data, all publications on the  
10 research will be included, with one selected as the primary study; the others will be considered as  
11 secondary publications with annotation indicating their relationship to the primary record during  
12 data extraction. For epidemiology studies, the primary publication will generally be the one with  
13 the longest follow-up, the largest number of cases, or the most recent publication date. EPA will  
14 include relevant data from all publications of the study, but if the same outcome is reported in more  
15 than one report, the data will only be extracted once.

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## **3.7. LITERATURE SURVEYS AND SUMMARY-LEVEL INVENTORIES**

16 During manual title/abstract and full-text screening, studies were categorized (or “tagged”)  
17 based on the following categories to help organize the literature, including both studies meeting the  
18 PECO-based inclusion criteria and potentially relevant supplemental materials. Summary-level  
19 inventories of basic study information (e.g., species; health outcomes) have been developed to aid  
20 subsequent steps, including study evaluations of included studies ([U.S. EPA, 2014](#)).

- 21 • “Included”: Epidemiological studies or physiologically based pharmacokinetic (PBPK)  
22 models meeting PECO-based inclusion criteria.
- 23 • “Potentially relevant supplemental materials”:
  - 24 ◦ Epidemiological studies on other health outcomes not listed in PECO.
  - 25 ◦ Toxicology: Experimental animal studies presenting original data potentially supportive  
26 of assessment of chronic exposure to inorganic arsenic (iAs).
  - 27 ◦ Mode of action/mechanistic: Studies that examine the molecular and/or cellular events  
28 and alterations in system biology occurring after iAs exposure (e.g., alterations in  
29 epigenomics, genomics, oxidative stress, immune function, and endocrine disruption).  
30 Metabolites of iAs are only considered as they pertain to MOA. Bioassays of metabolites  
31 may be cited if they inform the MOA.
  - 32 ◦ Meta-analyses that contain original analyses.

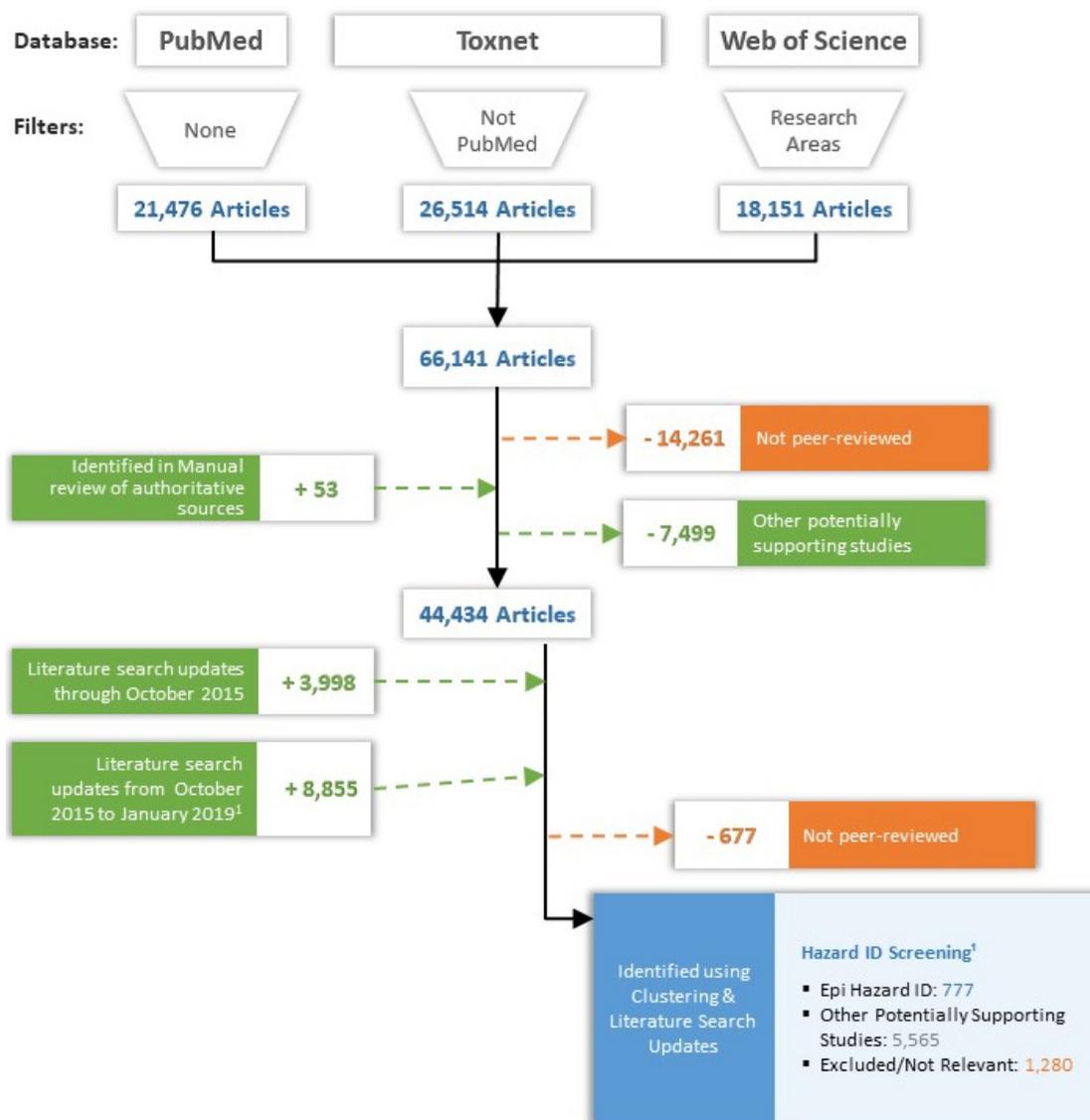
- 1           ◦ Susceptibility: Studies that do not meet PECO-based inclusion criteria, but which include  
2 analyses of health effects relevant to the PECO that are evaluated based on potential risk  
3 modifiers (e.g., smoking, genetic polymorphisms, susceptibility due to methylation  
4 capacity, socioeconomic factors, ethnicity).
- 5           ◦ ADME/toxicokinetics (TK): Studies that examine internal dose metrics, absorption,  
6 distribution, metabolism, and excretion (i.e., TK).
- 7           ◦ Exposure assessment: Studies that describe exposure to arsenic in the air, water, food,  
8 or through dermal contact. Includes bioavailability studies for the different media and  
9 studies that measured arsenic levels in humans (e.g., in nails, urine, blood) and studies  
10 that do not evaluate health outcomes but provide an understanding of arsenic  
11 exposures associated with health effects.
- 12           ◦ Life stages: Epidemiological and experimental animal studies help characterize in utero,  
13 childhood, puberty, pregnancy, women of child-bearing age, old-age susceptibilities.

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### **3.8. TRACKING STUDY ELIGIBILITY AND REPORTING THE FLOW OF INFORMATION**

14           The literature search and screening process is summarized in the study flow diagram (see  
15 Figure 3-1) and will be updated in HERO. Categories for exclusion include the following: (1) not  
16 relevant to PECO; (2) is a review, commentary, or letter with no original data (with exception of  
17 meta-analyses); (3) is a conference abstract or thesis (and the criteria for including unpublished  
18 data, described above, are not met); or (4) unable to obtain full text.

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<sup>1</sup> Screening of literature search updates from October 2015 to January 2019 is underway and will be updated in HERO.

**Figure 3-1. Literature search and screening process for inorganic arsenic assessment (will be updated in HERO).**

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### **3.9. STUDY EVALUATION (REPORTING, RISK OF BIAS, AND SENSITIVITY) STRATEGY FOR EPIDEMIOLOGICAL STUDIES**

1 Epidemiologic studies containing exposure- or dose-response data were subject to  
2 risk-of-bias (RoB) evaluations to assess aspects of internal validity of study findings based on study  
3 design and conduct for hazard identification. Key concerns are potential bias (factors that affect the  
4 magnitude or direction of an effect) and insensitivity (factors that limit the ability of a study to  
5 detect a true effect). Risk of bias for each study was evaluated using questions across seven  
6 evaluation domains (i.e., selection, confounding, performance, attrition, detection, selective  
7 reporting bias, and other) adapted from the OHAT approach ([NTP, 2013](#))<sup>4</sup> (see Table 3-2). Risk of  
8 bias was assessed for each study question using a rating system with four categories as follows:  
9 definitely low bias, probably low bias, probably high bias, and definitely high bias (see Table 3-3).  
10 Evaluations were documented using DRAGON online at the health-outcome level. Each study was  
11 evaluated independently by two scientists who used the draft OHAT approach for systematic  
12 review ([NTP, 2013](#)) and arsenic-specific clarifications developed, as needed, in consultation with  
13 technical experts for evaluation questions (see Section 3.2). The supporting rationale for each  
14 rating was documented by the reviewers. After independently reviewing a study, the two  
15 reviewers discussed differences and resolved any discrepancies between their ratings and  
16 rationales.

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<sup>4</sup>The OHAT method was used for this assessment because the current approach being used in IRIS had not been fully developed at the time these study evaluations were being conducted (2012 to 2017).

**Table 3-2. Risk-of-bias considerations**

<b>Category</b>	<b>Risk-of-bias question</b>
Selection	1) Was administered dose or exposure level adequately randomized? <sup>a</sup>
	2) Was allocation to study groups adequately concealed? <sup>a</sup>
	3) Were the comparison groups appropriate?
Confounding	4) Did the study design or analysis account for important confounding and modifying variables?
	5) Did researchers adjust or control for other exposures that are anticipated to bias results?
Performance	6) Were experimental conditions identical across study groups? <sup>a</sup>
	7) Did researchers adhere to the protocol?
	8) Were the research personnel and human subjects blinded to the study group during the study? <sup>a</sup>
Attrition	9) Were outcome data complete without attrition or exclusion from analysis?
Detection	10) Were the outcome assessors blinded to study group or exposure level?
	11) Were confounding variables assessed consistently across groups using valid and reliable measures?
	12) Can we be confident in the exposure characterization?
	13) Can we be confident in the outcome assessment?
Selective reporting bias	14) Were all measured outcomes reported?
Other	15) Were there no other potential threats to internal validity (e.g., statistical methods were appropriate)?

<sup>a</sup>These questions were not relevant for evaluating observational studies.

**Table 3-3. Risk-of-bias ratings**

Risk-of-bias rating	Description
(++) Definitely low	There is direct evidence of low risk-of-bias practices (direct evidence is an explicit statement(s), generally in the study report or through contacting the authors).
(+) Probably low	There is indirect evidence of low risk-of-bias practices, or it is deemed by the risk-of-bias evaluator that deviations from low risk-of-bias practices for these criteria during the study would not appreciably bias results, including consideration of direction and magnitude of bias (indirect evidence provides information to address the risk-of-bias question but falls short of direct evidence).
(-) Probably high	There is indirect evidence of high risk-of-bias practices, or there is insufficient information provided about relevant risk-of-bias practices.
(- -) Definitely high	There is direct evidence of high risk-of-bias practices (could include specific examples of relevant high risk-of-bias practices).

1           The OHAT risk-of-bias tool conclusions were combined with conclusions about sensitivity  
2 for each study to arrive at a conclusion about study confidence, which then was incorporated in the  
3 IRIS framework for evidence integration. The OHAT risk-of-bias tool conclusions were considered  
4 along with the identified strengths and limitations to reach a study confidence classification of *high*,  
5 *medium*, or *low* confidence, or *uninformative* for a specific health outcome. This classification was  
6 based on the reviewer judgments across the evaluation domains and considered the likely effect  
7 any noted deficiencies in bias and sensitivity or inadequate reporting would have on the results.  
8 The classifications, which reflected a consensus judgment between reviewers, are defined as  
9 follows:

- 10           • *High* confidence: No notable deficiencies or concerns were identified; the potential for bias  
11 is unlikely or minimal, and the study used sensitive methodology. *High*-confidence studies  
12 generally reflect judgments of definitely low risk of bias across all or most evaluation  
13 domains.
- 14           • *Medium* confidence: Possible deficiencies or concerns were noted, but the limitations are  
15 unlikely to be of a notable degree. Generally, *medium*-confidence studies include definitely  
16 low or probably low risk of bias across most domains, with the effect of any identified  
17 limitation not being judged as severe.
- 18           • *Low* confidence: Deficiencies or concerns are noted, and the potential for bias or inadequate  
19 sensitivity could have a significant impact on the study results or their interpretation.  
20 Typically, *low*-confidence studies have a high risk-of-bias evaluation for one or more  
21 domains, although some *medium*-confidence studies may have a high rating in the  
22 domain(s) considered to have less influence on the magnitude or direction of effect  
23 estimates. Generally, *low*-confidence results are given less weight than *high*- or  
24 *medium*-confidence results during evidence synthesis and integration and are generally not  
25 used for either hazard identification or dose-response unless they are the only studies  
26 available. Studies rated as *low* confidence only because of sensitivity concerns about bias

1 towards the null will be asterisked or otherwise noted because they may require additional  
2 consideration during evidence synthesis. Observing an effect in these studies may increase  
3 confidence during evidence synthesis, assuming the study is otherwise well conducted.

4 • *Uninformative*: Serious flaw(s) makes the study results unusable for informing hazard  
5 identification. Studies with definitely high risk-of-bias judgements in any evaluation  
6 domain are almost always classified as *uninformative* (see explanation above). Studies with  
7 multiple probably high risk-of-bias judgments across domains may also be considered  
8 *uninformative*. *Uninformative* studies will not be considered further in the synthesis and  
9 integration of evidence.

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### 3.10. DATA EXTRACTION

10 Data extraction and content management was carried out using DRAGON (see Section 3.3 for  
11 a list of data abstraction elements). Data abstraction was performed by one member of the  
12 evaluation team and checked by one to two other members.

13 In selecting specific epidemiological study results and data to present in the evidence table,  
14 adjusted statistical estimates (e.g., odds ratios adjusted for confounding factors) were presented  
15 rather than unadjusted or raw estimates, when possible. Data for all exposure metrics (including  
16 water, hair, nails, urine) are presented in the evidence tables. When multiple measures were  
17 presented for the same exposure metric, cumulative arsenic exposure levels were selected for  
18 inclusion in the evidence tables, when available. Total urinary arsenic levels were selected over  
19 concentrations of individual metabolites, when available. All results were included, regardless of  
20 statistical significance.

21 Routine attempts were made to obtain missing information from epidemiologic studies,  
22 focusing on information required to conduct a meta-analysis. Outreach to study authors was  
23 considered unsuccessful if researchers did not respond to an email or phone request within  
24 1 month of the attempt to contact.

25 All studies identified as potentially relevant for a specific health outcome were included in  
26 the evidence tables regardless of the results (positive, negative, or null). Evidence tables include  
27 information for comparing key features like study design, exposure metrics, and dose-response  
28 information. The data presented in the evidence table focus on general population risks. If the  
29 study only reported on a susceptible population (e.g., smokers) or life stage (e.g., childhood), these  
30 data are presented in the evidence tables and noted accordingly. These tables provide an overview  
31 of the key findings in a study and do not necessarily include all data or results presented in a study.

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### 3.11. EVIDENCE SYNTHESIS OF EPIDEMIOLOGICAL EVIDENCE

32 Each synthesis is written to provide a summary discussion of the available evidence that  
33 addresses considerations that may suggest causation adapted from considerations for causality  
34 introduced by Austin Bradford Hill ([Hill, 1965](#)), including consistency, exposure-response

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1 relationship, strength of the association, temporal relationship, biological plausibility, coherence,  
2 and “natural experiments” in humans ([U.S. EPA, 2005a, 1994](#)) (see Table 3-4). The approach taken  
3 for evidence synthesis within the IRIS Program is informed by both Hill and another widely used  
4 approach, the Grading of Recommendations Assessment, Development and Evaluation (GRADE)  
5 framework, which includes consideration of many of the concepts but provides more details on  
6 how to evaluate and document the expert judgments embedded in the process of evidence  
7 synthesis ([Guyatt et al., 2011](#); [Schünemann et al., 2011](#)). Importantly, the approach to the process  
8 of evidence synthesis explicitly considers and incorporates the conclusions from the individual  
9 study evaluations.

10 As indicated earlier, skin, bladder, and lung cancer and skin lesions are accepted hazard  
11 outcomes for inorganic arsenic ([NRC, 2013](#); [IARC, 2012](#); [ATSDR, 2007](#); [Health Canada, 2006](#); [IARC,](#)  
12 [2004b](#)) and were considered as *robust* evidence. Evidence synthesis conclusions were developed  
13 for cancers of kidney, liver, prostate, and pancreas; or noncancer effects of the circulatory system,  
14 pregnancy and birth outcomes, neurodevelopmental effects, diabetes, immune system, respiratory  
15 disease (nonmalignant), or renal disease as described below.

**Table 3-4. Information most relevant to describing primary considerations informing causality during evidence syntheses**

Consideration	Description and synthesis methods
Consistency	<p>Examines the similarity of results (e.g., direction; magnitude) across studies.</p> <p>When inconsistencies exist, the synthesis considers whether results were “conflicting” (i.e., unexplained positive and negative results in similarly exposed human populations) or “differing” (i.e., mixed results explained by differences between human populations, exposure conditions, or study methods) (<a href="#">U.S. EPA, 2005a</a>) based on analyses of potentially important explanatory factors, for example, review of results across:</p> <ul style="list-style-type: none"> <li>• Confidence in studies’ results, including study sensitivity (e.g., some study results that appear to be inconsistent may be explained by potential biases or other attributes that affect sensitivity, resulting in variations in the degree of confidence accorded to the study results);</li> <li>• Exposure, including route (if applicable), levels, duration, etc.;</li> <li>• Populations or species, including consideration of potential susceptible groups or differences across life stage at exposure or endpoint assessment; and</li> <li>• Toxicokinetic information as an explanation for any observed differences in responses across routes of exposure, other aspects of exposure, species, or life stages.</li> </ul> <p>The interpretation of the consistency of the evidence and the magnitude of the reported effects will emphasize biological significance as more relevant to the assessment than statistical significance. Statistical significance (as reported by <i>p</i>-values, etc.) provides no evidence about effect size or biological significance, and a lack of statistical significance will not automatically be interpreted as evidence of no effect.</p>
Strength (effect magnitude) and precision	<p>Examines the effect magnitude or relative risk, based on what is known about the assessed endpoint(s), and considers the precision of the reported results based on analyses of variability (e.g., confidence intervals; standard error).</p> <p>Syntheses will analyze results both within and across studies and may consider the utility of combined analyses (e.g., meta-analysis). While larger effect magnitudes and precision (e.g., <i>p</i> &lt; 0.05) help reduce concerns about chance, bias, or other factors as explanatory, syntheses should also consider the biological or population-level significance of small effect sizes. Thus, a lack of statistical significance should not be automatically interpreted as evidence of no effect.</p>

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Consideration	Description and synthesis methods
Biological gradient/dose-response	<p>Examines whether the results (e.g., response magnitude; incidence; severity) change in a manner consistent with changes in exposure (e.g., level; duration).</p> <p>Syntheses will consider relationships both within and across studies, acknowledging that the dose-response curve (e.g., shape) can vary depending on the outcome and the toxicokinetics of the chemical (among other things). Evidence of a monotonic dose-response relationship often strengthens evidence synthesis conclusions, although there are cases in which monotonicity should not necessarily be expected (e.g., different outcomes may be expected at low vs. high doses due to activation of different mechanistic pathways or induction of systemic toxicity at very high doses). For reversible responses, decreases in a response after cessation of exposure also may strengthen synthesis conclusions.</p>
Coherence	<p>Examines the extent to which findings are cohesive across different endpoints that are known/expected to be related to, or dependent on, one another (e.g., based on known biology of the organ system or disease, or mechanistic understanding such as toxicokinetic/dynamic understanding of the chemical or related chemicals). In some instances, additional analyses of mechanistic evidence from research on the chemical under review or related chemicals that evaluate linkages between endpoints or organ-specific effects may be needed to interpret the evidence. These analyses may require additional literature search strategies.</p> <p>Syntheses will consider potentially related findings, both within and across studies, particularly when relationships are observed within a cohort or within a narrowly defined category (e.g., occupation, strain or sex, life stage of exposure). Syntheses will emphasize evidence indicative of a progression of effects, such as temporal- or dose-dependent increases in the severity of the type of endpoint observed.</p>
Natural experiments	<p>Specific to epidemiology studies and rarely available, this examines effects in populations that have experienced well-described, pronounced changes in exposure to the chemical of interest (e.g., blood lead levels before and after banning lead in gasoline).</p>

1            In addition, to the extent the data allowed, the syntheses discussed analyses relating to  
2 potential susceptible populations,<sup>5</sup> based on knowledge about the health outcome or organ system  
3 affected, demographics, genetic variability, life stage, health status, behaviors or practices, social  
4 determinants, and exposure to other pollutants (see Table 3-5). Consideration of susceptible life  
5 stages and populations was considered as previously described ([U.S. EPA, 2015, 2014](#)). Briefly, a  
6 targeted literature search was conducted using the overall arsenic literature database and

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<sup>5</sup>Various terms have been used to characterize populations that may be at increased risk of developing health effects from exposure to environmental chemicals, including “susceptible,” “vulnerable,” and “sensitive.” Further, these terms have been inconsistently defined across the scientific literature. The term susceptibility is used in this protocol to describe populations at increased risk, focusing on biological (intrinsic) factors, as well as social and behavioral determinants that can modify the effect of a specific exposure. However, certain factors resulting in higher exposures to specific groups (e.g., proximity, occupation, housing) may not be analyzed to describe potential susceptibility among specific populations or subgroups.

- 1 modifying factors were evaluated using EPA’s strength-of-evidence framework for susceptibility
- 2 (see Chapter 5 in [U.S. EPA \(2013\)](#) for additional discussion).

**Table 3-5. Individual and social factors that may increase susceptibility to exposure-related health effects**

Factor	Examples
Demographic	Gender, age, race/ethnicity, education, income, occupation, geography
Genetic variability	Polymorphisms in genes regulating cell cycle, DNA repair, cell division, cell signaling, cell structure, gene expression, apoptosis, and metabolism
Life stage	In utero, childhood, puberty, pregnancy, women of child bearing age, old age
Health status	Pre-existing conditions or disease such as psychosocial stress, body mass index, frailty, nutritional status, chronic disease
Behaviors or practices	Diet, mouthing, smoking, alcohol consumption, pica, subsistence or recreational hunting and fishing
Social determinants	Income, socioeconomic status, neighborhood factors, health care access, and social, economic, and political inequality
Women and men of reproductive age	Preconception and early fetal development (e.g., females who are in the early pregnancy but are not yet aware of their pregnancy)

3 Evidence synthesis was based primarily on studies of *high* and *medium* confidence.  
 4 *Low*-confidence studies were used, if few or no studies with higher confidence are available, to help  
 5 evaluate consistency, or if the study designs of the *low*-confidence studies address notable  
 6 uncertainties in the set of *high*- or *medium*-confidence studies on a given health effect. If  
 7 *low*-confidence studies were used, then a careful examination of risk bias and sensitivity with  
 8 potential effects on the evidence synthesis conclusions was included in the narrative.

9 As previously described, these syntheses articulated the strengths and the weaknesses of  
 10 the available evidence organized around the considerations described in Table 3-4 as well as issues  
 11 that stem from the evaluation of individual studies (e.g., concerns about bias or sensitivity). If  
 12 possible, results across studies were compared using graphs and charts or other data visualization  
 13 strategies. The analysis typically included examination of results stratified by any or all of the  
 14 following: study confidence classification (or specific issues within confidence evaluation domains),  
 15 population, exposures (e.g., level, patterns [intermittent or continuous], duration, intensity),  
 16 sensitivity (e.g., low vs. high), and other factors that were identified in the refined evaluation plan  
 17 (e.g., sex, life stage, or other demographics). Study sensitivity assesses whether factors in the  
 18 study’s design and conduct may reduce its ability to observe an effect, if present. The number of  
 19 studies and the differences encompassed by the studies determined the extent to which specific  
 20 types of factors can be examined to stratify study results.

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1 Evidence integration conclusions were summarized in an evidence profile table for each  
2 hazard using the considerations outlined in Table 3-6. This process is similar to that used by  
3 GRADE ([Morgan et al., 2016](#); [Guyatt et al., 2011](#); [Schünemann et al., 2011](#)), which arrives at an  
4 overall level of confidence conclusion based on considering the body of evidence. The evidence  
5 profile table summarized the judgments and their evidence basis. Judgments were reached after  
6 group discussion by the assessment team and independent review by the systematic review experts  
7 within EPA.

8 The analyses of each consideration in Table 3-6 was used to develop a strength-of-evidence  
9 judgment. Table 3-7 provides the judgments for each category and the criteria that guided how to  
10 apply the judgments. Briefly, the terms *robust* and *moderate* are standardized characterizations for  
11 judgments on the extent of support provided by human studies that the health effect(s) results from  
12 chemical exposure. These terms are differentiated by the quantity and quality of information  
13 available to rule out alternative explanations for the results. The term *slight* indicates situations in  
14 which there is some evidence indicating an association within the evidence stream, but substantial  
15 uncertainties in the data prevent stronger judgments from being drawn. *Indeterminate* reflects  
16 evidence-stream judgments when no studies are available, or situations in which the evidence is  
17 inconsistent and/or primarily of *low* confidence. *Compelling evidence of no effect* represents a  
18 situation in which extensive evidence across a range of populations and exposures has identified no  
19 effects/associations. This scenario is seldom used because it requires a high degree of confidence  
20 in the conduct of individual studies, including consideration of study sensitivity, and  
21 comprehensive assessments of health outcomes and life stages of exposure.

**Table 3-6. Considerations that inform judgments regarding the strength of the human evidence**

Consideration	Increased evidence strength	Decreased evidence strength
Evidence synthesis scenarios that do not warrant an increase or decrease in evidence strength will be considered “neutral” and do not need to be described in the evidence profile table.		
Risk of bias (across studies)	An evidence base of <i>high-</i> or <i>medium-</i> confidence studies increases strength.	An evidence base of mostly <i>low-</i> confidence studies decreases strength. Decisions to increase strength for other factors should generally not be made if there are serious concerns for risk of bias.
Study sensitivity (across studies)	An evidence base of studies with mostly <i>good</i> or <i>adequate</i> sensitivity increases strength.	An evidence base of studies with poor sensitivity typically decreases confidence in null conclusions. Conversely, an evidence base of studies with mostly poor sensitivity may increase evidence strength in cases where an association is identified because the most common predicted impact of study insensitivity is towards the null.
Consistency	Similarity of findings for a given outcome (e.g., of a similar magnitude, direction) across independent studies or experiments increases strength, particularly when consistency is observed across populations (e.g., location) or exposure scenarios in human studies.	Unexplained inconsistency (conflicting evidence) decreases strength. Strength should not be decreased if discrepant findings can be explained by study confidence conclusions; variation in population, sex, and life stage; exposure patterns (e.g., intermittent or continuous); levels (low or high); duration; or intensity.
Strength (effect magnitude) and precision	Evidence of a large magnitude effect (considered either within or across studies), can increase strength. Precise results from individual studies or across the set of studies, noting that biological significance is prioritized over statistical significance.	The presence of small effects is not typically used to decrease confidence in a body of studies. However, if effect sizes that are small in magnitude are concluded not to be biologically significant, or if there are only a few studies with imprecise results, then strength is decreased.

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<b>Consideration</b>	<b>Increased evidence strength</b>	<b>Decreased evidence strength</b>
Biological gradient/dose-response	Evidence of dose-response relationship, which may be demonstrated across studies or within studies.	A lack of dose-response relationship when expected based on biological understanding and having a wide range of doses/exposures evaluated in the evidence base can decrease strength. If the data are not adequate to evaluate a dose-response pattern, then strength is neither increased or decreased.
Coherence	Biologically related findings within an organ system, or across populations (e.g., sex), particularly when a temporal- or dose-dependent progression of related effects is observed within or across studies.	An observed lack of expected coherent changes (e.g., well-established biological relationships), particularly when observed for multiple related endpoints, will typically decrease evidence strength. Decision to decrease depends on the strength of the expected relationship(s), and considers factors (e.g., dose and duration of exposure) across studies of related changes.

**Table 3-7. Framework for evidence judgments from studies in humans**

Within-stream strength-of-evidence judgment	Description
<p><i>Robust</i> (⊕⊕⊕) ... evidence in human studies</p>	<p>A set of <i>high-</i> or <i>medium-</i>confidence independent studies reporting an association between the exposure and the health outcome, with reasonable confidence that alternative explanations, including chance, bias, and confounding, can be ruled out across studies. The set of studies is primarily consistent, with reasonable explanations when results differ; an exposure-response gradient is demonstrated; and the set of studies includes varied populations. Additional supporting evidence, such as associations with biologically related endpoints in human studies (coherence) or large estimates of risk, may increase confidence but are not required.</p> <p>In exceptional circumstances, a finding in one study may be considered <i>robust</i>, even when other studies are not available (e.g., analogous to the finding of angiosarcoma, an exceedingly rare liver cancer, in the vinyl chloride industry).</p> <p>Mechanistic evidence from exposed humans or human cells, if available, may add support informing considerations such as exposure response, temporality, coherence, and MOA, thus raising the level of certainty to <i>robust</i> for a set of studies that otherwise would be described as <i>moderate</i>.</p>
<p><i>Moderate</i> (⊕⊕⊖) ... evidence in human studies</p>	<p>A smaller number of studies (at least one <i>high-</i> or <i>medium-</i>confidence study with supporting evidence), or with some heterogeneous results, that do not reach the degree of confidence required for <i>robust</i>. For multiple studies, there is primarily consistent evidence of an association, but there may be lingering uncertainty due to potential chance, bias, or confounding.</p> <p>For a single study, there is a large magnitude effect or dose-response gradient observed in a study where exposure is well characterized.</p> <p>Supporting evidence could include associations with related endpoints, including mechanistic evidence from exposed humans or human cells, if available, based on considerations such as exposure response, temporality, coherence, and MOA, thus raising the level of certainty to <i>moderate</i> for a set of studies that otherwise would be described as <i>slight</i>.</p>
<p><i>Slight</i> (⊕⊖⊖) ... evidence in human studies</p>	<p>One or more studies reporting an association between exposure and the health outcome, where considerable uncertainty exists. In general, only <i>low-</i>confidence studies may be available, or considerable heterogeneity across studies may exist. Supporting coherent evidence is sparse. Strong biological support from mechanistic evidence in exposed humans or human cells may also be independently interpreted as <i>slight</i>. This category serves primarily to encourage additional study where evidence does exist that might provide some support for an association, but for which the evidence does not reach the degree of confidence required for <i>moderate</i>.</p>
<p><i>Indeterminate</i> (⊖⊖⊖) ... evidence in human studies</p>	<p>No studies available in humans or situations when the evidence is inconsistent and/or primarily of <i>low</i> confidence.</p>

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Within-stream strength-of-evidence judgment	Description
<i>Compelling evidence of no effect (- -) ... in human studies</i>	Several <i>high</i> -confidence studies showing null results (for example, an odds ratio of 1.0), ruling out alternative explanations including chance, bias, and confounding with reasonable confidence. Each of the studies should have used an optimal outcome and exposure assessment and adequate sample size (specifically for higher exposure groups and for susceptible populations). The set should include the full range of levels of exposures that human beings are known to encounter, an evaluation of an exposure-response gradient, and an examination of at-risk populations and life stages.

1           Based on the totality of the evidence, this stage culminated in a narrative that summarized  
 2 the conclusions regarding each potential health effect (i.e., each noncancer health effect and specific  
 3 type of cancer, or broader grouping of related outcomes as defined in the evaluation plan). The  
 4 evidence narrative included:

- 5           • A descriptive summary of the primary conclusions about the potential for health effects in  
 6 exposed humans;
- 7           • A summary of key evidence supporting these conclusions, highlighting the primary drivers  
 8 of these judgments and any notable issues (e.g., data quality; coherence of the results), and a  
 9 narrative expression of confidence across these conclusions;
- 10          • Information on the conditions of expression of these health effects (e.g., exposure routes,  
 11 levels of exposure, etc.);
- 12          • Indications of potentially susceptible populations or life stages;
- 13          • A summary of key assumptions used in the analysis, which are often based on EPA  
 14 guidelines; and
- 15          • Strengths and limitations of the conclusions, including key uncertainties and data gaps.

16           For evaluations of carcinogenicity consistent with EPA’s Cancer Guidelines ([U.S. EPA,](#)  
 17 [2005a](#)), one of EPA’s standardized cancer descriptors was used as a shorthand characterization of  
 18 the evidence integration narrative, describing the overall potential for carcinogenicity. These are  
 19 (1) *carcinogenic to humans*, (2) *likely to be carcinogenic to humans*, (3) *suggestive evidence of*  
 20 *carcinogenic potential*, (4) *inadequate information to assess carcinogenic potential*, or (5) *not likely*  
 21 *to be carcinogenic to humans*. Because bladder cancer and lung cancer are accepted hazards, the  
 22 corresponding cancer descriptors for these health outcomes are carcinogenic to humans.

23           Currently, EPA does not have guidance on the use of standardized descriptors for noncancer  
 24 hazards, so none will be applied, although conclusions indicated confidence in the body of evidence

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- 1 (e.g., “evidence demonstrates,” “evidence suggests,” or through use of symbols ⊕⊕⊕, ⊕⊕⊖,
- 2 ⊕⊖⊖, or ⊖⊖⊖) with exposure context provided.

## 4. PHYSIOLOGICALLY BASED PHARMACOKINETIC MODEL DESCRIPTIVE SUMMARY AND EVALUATION

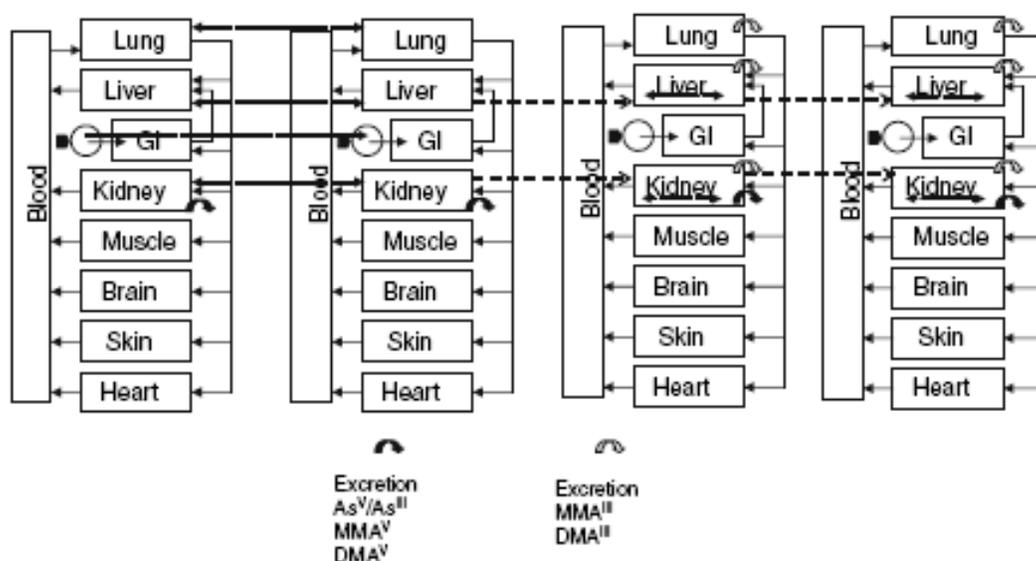
1 Physiologically based pharmacokinetic (PBPK) models for inorganic arsenic are important  
2 for describing exposure-internal dose relationships and, thus, informing dose-response estimates.  
3 Judgments on the suitability of a model are separated into two categories: scientific and technical.  
4 The scientific criteria focus on whether the biology, chemistry, and other information available for  
5 chemical mode(s) of action (MOA[s]) are justified (i.e., preferably with citations to support use) and  
6 represented by the model structure and equations. The scientific criteria are judged based on  
7 information presented in the publication or report that describes the model and do not require  
8 evaluation of the computer code. Preliminary technical criteria include availability of the computer  
9 code and completeness of parameter listing and documentation. Studies that meet the preliminary  
10 scientific and technical criteria are then subjected to an in-depth technical evaluation, which  
11 includes a thorough review and testing of the computational code. The in-depth technical and  
12 scientific analyses focus on the accurate implementation of the conceptual model in the  
13 computational code, use of scientifically supported and biologically consistent parameters in the  
14 model, and reproducibility of model results reported in journal publications and other documents.  
15 This approach stresses (1) clarity in the documentation of model purpose, structure, and biological  
16 characterization; (2) validation of mathematical descriptions, parameter values, and computer  
17 implementation; and (3) evaluation of each plausible dose metric. The in-depth analysis was used  
18 to evaluate the potential value and cost of developing a new model or substantially revising an  
19 existing one as a component of the draft assessment or by publication in a peer-reviewed journal.

20 The development of useful biologically based dose-response models has proved challenging  
21 because inorganic arsenic mediates its toxicity through a range of metabolites, and their roles with  
22 regard to specific adverse effects are not clear (Clewell et al., 2007). PBPK models have been  
23 developed specifically for inorganic arsenic exposure (El-Masri and Kenyon, 2008; Gentry et al.,  
24 2004; Yu, 1999b; Mann et al., 1996a, b). Mann et al. (1996a) provided a PBPK model for hamsters  
25 and rabbits, and Mann et al. (1996b) described an extension of this model for humans, but model  
26 code was not available for the human version. For the Yu (1999a) human model, it is not clear how  
27 model optimization was performed. The Gentry et al. (2004) mouse model used the same partition  
28 coefficients used by Mann et al. (1996a). Liao et al. (2008) described the combination of a PBPK  
29 model for human children with a Weibull dose-response model. These models were evaluated  
30 using the approach described above (see Appendix A), and the El-Masri and Kenyon (2008) model  
31 was chosen as the most appropriate because it is peer reviewed, optimized, and specific to humans.

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1 This PBPK model will be used to obtain a common exposure metric for use in dose-response  
2 meta-analyses.

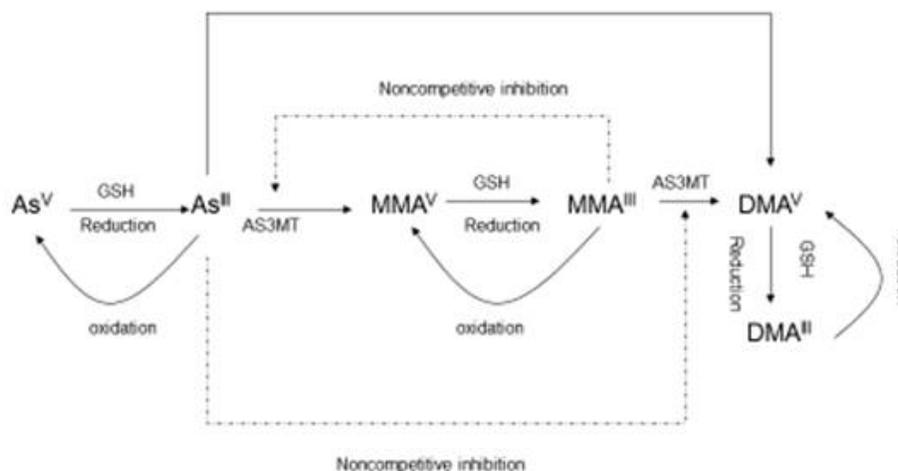
3 The El-Masri and Kenyon PBPK model (El-Masri and Kenyon, 2008) for arsenic was  
4 developed for a human male and incorporates the different forms of arsenic. These forms include  
5 arsenate (As[V]), arsenite (As[III]), monomethylarsenic acid (MMA[V]), dimethylarsenic acid  
6 (DMA[V]), monomethylarsonous acid (MMA[III]), and dimethylarsonous acid (DMA[III]) (El-Masri  
7 and Kenyon, 2008)]. There are no available models for women of reproductive age, pregnant  
8 women, or children. This model has eight compartments: lung, liver, gastrointestinal (GI) tract  
9 (lumen and tissue), kidney, muscle, brain, skin, and heart (see Figure 4-1). The physiological  
10 parameters came from the literature (Brown et al., 1997). The arsenic species and their  
11 metabolites are distributed in the systemic circulation simultaneously. Metabolism of inorganic  
12 arsenic, and its metabolites was described in the PBPK model as a series of reduction and oxidative  
13 methylation steps. Parameters for the metabolic rate equations were estimated using published  
14 literature values, or via optimization of simulations to data. The routes of absorption are oral,  
15 dermal, and inhalation. Dermal absorption and urinary elimination are described in the model as  
16 first-order processes. The partition coefficient came from the literature (Benramdane et al., 1999;  
17 Saady et al., 1989) and is a single coefficient for total As. The authors then made a correction using  
18 the ratio of the specific distribution of As species and the total measured as reported by Saady et al.  
19 (1989). The authors conclude that the partition coefficients were relatively similar to those used by  
20 Yu (1999b). The authors assumed flow-limited diffusion in each compartment and distinguished  
21 the ionization levels of MMA and DMA.



**Figure 4-1. Conceptual representation of physiologically based pharmacokinetic (PBPK) model.**

Source: [El-Masri and Kenyon \(2008\)](#).

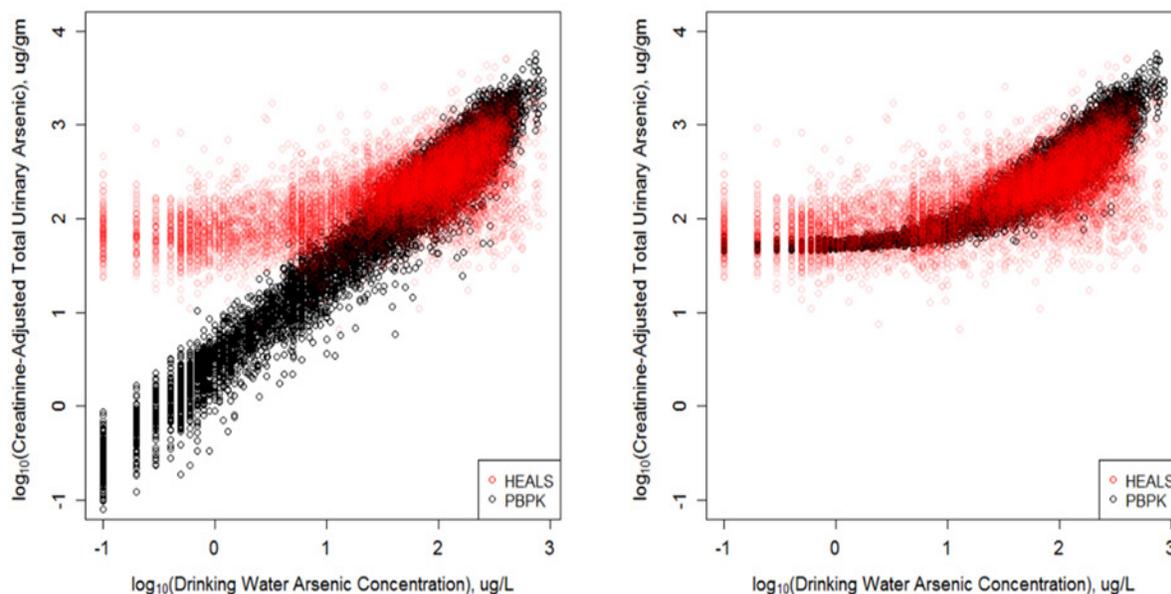
1 For the metabolites, the authors suggested inhibitory effects of As(III) on the methylation of  
2 MMA(III) to DMA(V), MMA(III) on the methylation of As(III) and the methylation of MMA(III) to  
3 DMA(V), and MMA(III) on the methylation of As(III) to MMA, which were modeled as  
4 noncompetitive inhibition (see Figure 4-2).



**Figure 4-2. Metabolism pathways described in the literature.**

Source: [El-Masri and Kenyon \(2008\)](#).

5 The [El-Masri and Kenyon \(2008\)](#) model was run using the Simulink platform, with  
6 parameter optimization conducted using MATLAB® against two large data sets (~11,000 and  
7 500 subjects in Bangladesh and Nevada, respectively; see [Buchet et al. \(1981b\)](#), [Buchet et al.](#)  
8 [\(1981a\)](#), and [Lee et al. \(1999\)](#), which provided matched individual chronic inorganic arsenic  
9 drinking water exposure and urinary excretion data. Overall, the evaluation of the model showed a  
10 better prediction at a low dose than at a high dose ([El-Masri et al., 2018](#)). Results illustrated the  
11 PBPK model's use in evaluating the contribution of arsenic in food and water to total exposure and  
12 demonstrated the model's value in reconstructing human exposures to inorganic arsenic,  
13 particularly in individuals exposed to relatively low levels of arsenic in water or food [see Figure 4-  
14 3; El-Masri et al. ([2018](#))].



**Figure 4-3. Relationship between arsenic water levels and physiologically based pharmacokinetic (PBPK) model-predicted creatinine-adjusted total urinary arsenic concentrations for the Health Effects of Arsenic Longitudinal Study (HEALS) data set.** Left: well water as the only arsenic intake source. Right: combined well-water and dietary exposure as the arsenic intake source.

## **5. DOSE-RESPONSE ASSESSMENT: SCREENING EPIDEMIOLOGICAL DATA SETS, ESTIMATING INTAKE DOSES, MODELING DOSE-RESPONSE DATA, AND DERIVING REFERENCE VALUES**

1            Selection of specific data sets for dose-response assessment and performance of the  
2 dose-response assessment is conducted after hazard identification is complete and involves  
3 database- and chemical-specific biological judgments that are beyond the scope of this protocol.  
4 But they are discussed in existing EPA guidance and support documents, especially EPA’s  
5 *Benchmark Dose Technical Guidance* ([U.S. EPA, 2012](#)), EPA’s *Review of the Reference Dose and*  
6 *Reference Concentration Processes* ([U.S. EPA, 2002b](#)), *Guidelines for Carcinogen Risk Assessment* ([U.S.](#)  
7 [EPA, 2005a](#)), and *Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to*  
8 *Carcinogens* ([U.S. EPA, 2005b](#)). This section of the protocol provides an overview of the process  
9 EPA will use when conducting the inorganic arsenic (iAs) dose-response assessment and deriving  
10 toxicity reference values (e.g., slope factors and RfDs), including further identifying health  
11 outcomes that can support dose-response modeling, the estimation of intake doses and adjusted  
12 cases from study data, and preferred approaches to modeling the adjusted dose-response data.

---

### **5.1. INITIAL SCREENING ANALYSES**

13            Studies for *robust* or *moderate* health outcomes were first reviewed for their suitability for  
14 dose-response modeling based on key considerations that are summarized in Table 5-1.

**Table 5-1. Rating criteria for inorganic arsenic exposure- or dose-response data sets for prioritizing studies for dose-response analysis**

<b>Consideration</b>	<b>Criteria</b>
Endpoint	Incidence data generally preferred over mortality data
Exposure ascertainment method	Location of residence/exposure or large group averages instead of individual measurement or small group averages
Exposure reporting	Reported as ranges without summary statistics such as averages and measures of dispersion/variance
Estimates control for smoking, gender, age, and other key covariates	Adjusted estimates do not include important covariates
Number of exposure groups	Less than two in addition to referent precludes exposure-response modeling; more groups support more complex models
Number of subjects (referents) and cases reported	One or both elements missing; only summary measures (relative risk [RR], standardized mortality ratios [SMRs], etc.) are reported without confidence intervals or variability measures
Exposure/biomarker metric	Worst = historical exposure measurement at a single point in time only; better = cumulative exposure estimates; best = cumulative intake estimates (no markdown for use of urinary As biomarker)
Exposure timing and duration	Exposure histories (timing, duration) not adequately ascertained or reported
Representativeness of referent group/controls	Not documented or differs from exposed groups, without reported adjustment (case-control only)

1           After applying these criteria, a large number of data sets that varied considerably in their  
2 suitability for dose-response analysis remained. Evaluating this large number of datasets using the  
3 methods described in Section 5.2–5.5 was problematic given the impracticality of converting all  
4 exposure metrics reported in the studies to a single intake dose metric and performing complex  
5 statistical dose-response modeling for all outcomes. To provide additional context for prioritized  
6 health outcomes, studies, and data sets, a preliminary analysis was developed that utilizes the  
7 exposure metrics and relative risk estimates reported by the study authors. Benchmark dose  
8 modeling is used to obtain a study-specific estimate of the exposure level associated with a given  
9 relative risk (RRE). This RRE estimate is divided by an estimated background exposure level (in  
10 terms of the study-specific exposure metrics) to obtain what will be referred to as an RRB (relative  
11 risk exposure vs. background exposure) ratio; the lower a RRB value, the greater the concern. For  
12 the purposes of this analysis, the data sets identified after applying the Table 5-1 rating criteria  
13 were subjected to additional considerations that included:

- 14           • the type of response data reported (published relative risk [RR] estimates are necessary for  
15 the RRB analysis),

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- 1 • the exposure or biomarker metric used in the study (e.g., drinking water vs. urine, historic  
2 exposure vs. cumulative exposure [preferred]),
- 3 • whether the study provided the necessary quantitative data for modeling (e.g., number of  
4 cases and controls for all exposure groups), and
- 5 • whether a sufficient number of subjects were included in the analysis (it is desirable to have  
6  $\geq$  five cases/exposure group).

7 In total, more than 250 separate data sets were identified as suitable for the purposes of the  
8 screening analysis and were modeled using EPA's Benchmark Dose Software ([www.epa.gov/bmds](http://www.epa.gov/bmds)).  
9 Points of departure were based on the maximum likelihood estimate of the exposure or biomarker  
10 metric reported in a study that would increase the relative risk by 20% [RRE<sub>20</sub>]<sup>6</sup> to derive RRB  
11 values for each data set. The RRE<sub>20</sub> value was then divided by an estimate of the general U.S.  
12 population's exposure (see Table 5-2) in the units used to derive the RRE<sub>20</sub>.<sup>7</sup>

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<sup>6</sup>The RRE<sub>20</sub> is not meant to represent a "clinically significant" endpoint or to have any other policy-relevant interpretation other than for purposes such as those described for this RRB analysis, particularly the identification of studies and health outcomes that warrant further consideration for additional dose-response analysis. The 20% effect level was chosen for this comparative analysis after examination of the effect sizes and exposure ranges of the input data sets. A key consideration was that EPA wanted the output RRE values to be in or near the range of the input data as frequently as possible; that is, extrapolating far outside the range of data was to be avoided.

<sup>7</sup>This results in a unitless RRE<sub>20</sub>/U.S. background ratio that can be compared across studies regardless of the exposure metric reported in the study.

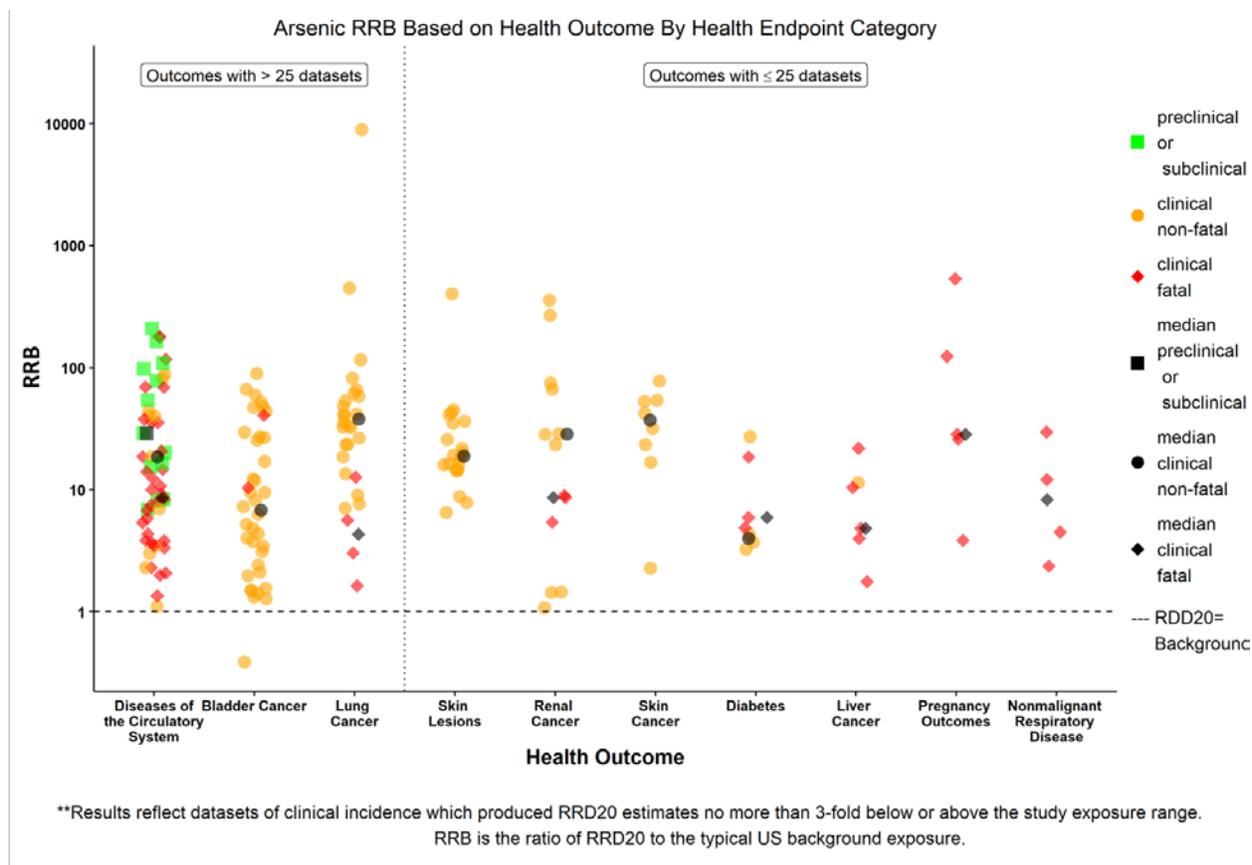
**Table 5-2. United States estimates for different arsenic exposure and dose metrics**

<b>Exposure metric</b>	<b>Units</b>	<b>U.S. central tendency</b>	<b>U.S. "high"</b>	<b>Basis for U.S. estimate</b>
Drinking water concentration	µg/L	1.5	15.4	Median, 95 <sup>th</sup> percentile county mean As in drinking water ( <a href="#">USGS, 2011</a> )
Cumulative exposure from drinking water	µg/yr-L	75	770	1.5 µg/L or 15.4 µg/L for 50 yr
Daily intake	µg/day (water)	1.5	15.4	1.5, 15 µg/L (above), 1.0 L/day ( <a href="#">U.S. EPA, 2011</a> )
Dietary intake	µg/day (food)	3.5	13.3	Mean, 95 <sup>th</sup> percentile adult intake ( <a href="#">Xue et al., 2010</a> ); 0.05, 0.19 µg/kg-d), 70-kg adult
	µg/day (food + water)	5	28.7	Sum of food and water
Cumulative intake	mg (cumulative intake, water)	27.4	281	50 yr intake @ 1.5, 15.4 µg/day
	mg (cumulative intake, food + water)	91.3	524	50 yr intake @ 5, 28.7 µg/day
Urine concentration (cr. Adj.)	µg As excretion/g creatinine	7.4	18.4	NHANES (2013–2014) median, 95 <sup>th</sup> percentile ( <a href="#">CDC, 2016</a> )
Urine concentration	µg AS excretion/L urine	5	16.8	NHANES (2013–2014) median, 95 <sup>th</sup> percentile ( <a href="#">CDC, 2016</a> )
Air	µg/m <sup>3</sup>	0.00075	0.00156	<a href="https://cfpub.epa.gov/roe/indicator.cfm?i=90#8">https://cfpub.epa.gov/roe/indicator.cfm?i=90#8</a> ; EPA's ambient monitoring archive, arsenic data averaged between 2010 and 2013
Cumulative air	µg/m <sup>3</sup> -years	0.0375	0.078	50 yr of inhalation

1 To assist in prioritizing health outcomes for more in-depth dose-response analyses, EPA  
 2 considered the number of suitable data sets available and estimated the average and median RRBs  
 3 for each health outcome. Background lifetime risk was also a consideration because a 20% increase  
 4 in the relative risk of a health outcome with a high background lifetime risk could have a more  
 5 serious public health implication relative to a health outcome with a low background lifetime risk.

6 Figure 5-1 presents the results of the RRB screening analysis. Immune effects and  
 7 developmental neurocognitive effects were not included in the RRB analysis because of the absence

- 1 of suitable studies reporting relative risk (RR) estimates<sup>8</sup> necessary for deriving RRB values that
- 2 can be compared across studies.



**Figure 5-1. Individual and median RRB estimates for considered health outcomes.**

- 3 The results of this RRB analysis, along with the considerations described above, were then
- 4 used to inform the selection of studies and data sets for further dose-response analysis (see
- 5 Section 5.5). With respect to exposure context, out of the 12 health outcomes considered in the
- 6 RRB analysis, diseases of the circulatory system, bladder cancer, and lung cancer had multiple
- 7 individual study RRB values close to 1, with median RRB values near or below 10, indicating that
- 8 exposures resulting in a 20% increase in relative risk were very close to U.S. background exposure
- 9 levels for inorganic arsenic. These outcomes also had the largest databases suitable for further
- 10 dose-response modeling (>25 data sets). Based on these RRB screening results, bladder cancer,

<sup>8</sup>Principally due to an inappropriate study design (e.g., ecological epidemiology) or a lack of data needed for dose-response modeling (e.g., only regression coefficients provided, cases or number of subjects not reported, etc.).

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1 lung cancer, disorders of the cardiovascular system, pregnancy and birth outcomes, and diabetes  
2 have been prioritized for additional dose-response analysis. Although the remaining health  
3 outcomes had either higher RRB values (skin cancer, skin lesions) or smaller databases (liver  
4 cancer and nonmalignant respiratory disease) than the prioritized outcomes, they will still be  
5 considered for further dose-response analysis if feasible. Additionally, developmental  
6 neurotoxicity (i.e., developmental neurocognitive effects) have been identified as being particularly  
7 important to EPA Program Offices for benefit-cost analysis. Therefore, while the lack of published  
8 relative risk estimates necessary for the derivation of RRE<sub>20</sub> estimates did not allow for the  
9 inclusion of the developmental neurotoxicity (i.e., developmental neurocognitive effects) in the RRB  
10 comparative analysis, a thorough dose-response analyses on key continuous variables associated  
11 with this health outcome are planned. Table 5-3 summarizes the status of each of the NRC  
12 hierarchy of outcomes proposed for inclusion in the assessment. Additional dose-response  
13 analyses, including analyses of potentially sensitive subgroups, will be performed on these health  
14 outcomes as appropriate given their respective databases (see Section 5.5).

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**Table 5-3. Status of [NRC \(2013\)](#) prioritization of health outcomes of concern for dose-response analysis in EPA’s inorganic arsenic assessment**

<b>Health outcome</b>	<b>NRC Tier</b>	<b>EPA SR</b>	<b>Strength-of-Evidence</b>	<b>Proposed status for dose-response analysis in assessment</b>
Lung cancer	1	No	Robust	✓
Bladder cancer	1	No	Robust	✓
Skin cancer	1	No	Robust	✓
IHD and CVD	1	Yes	Robust	✓ U.S. lifetime extra risks estimated for fatal IHD, fatal CVD, and incidence of CVD (IHD + stroke).
Skin lesions	1	No	Robust	✓
Prostate cancer	2	Yes	Slight	Not prioritized for dose-response based on hazard characterization
Renal cancer	2	Yes	Moderate	✓
Diabetes	2	Yes	Robust	✓
Nonmalignant respiratory disease	2	Yes	Moderate	✓
Pregnancy outcomes (infant morbidity)	2	Yes	Robust	✓
Neurodevelopmental toxicity	2	Yes	Moderate	✓ Small database, included for use in benefit-cost analyses by other Program Offices
Immune effects	2	Yes	Moderate	Not prioritized for dose-response (no suitable data sets for analysis).
Pregnancy outcomes (fetal loss, stillbirth, and neonatal mortality)	3	Yes	Robust	✓
Liver cancer	3	Yes	Moderate	✓
Pancreatic cancer	3	Yes	Slight	Not prioritized for dose-response based on hazard characterization
Renal disease	3	Yes	Slight	Not prioritized for dose-response based on hazard characterization
Hypertension	3	Yes	Robust	Not prioritized as a separate DCS outcome based on existence of a larger database and stronger dose-response for other DCS outcomes, IHD, and CVD.
Stroke	3	Yes	Robust	✓ U.S. lifetime extra risks estimated for CVD (IHD + stroke) incidence and fatality

SR= systematic review; CVD = cardiovascular disease; IHD = Ischemic heart disease; DCS = diseases of the circulatory system.

---

## 5.2. DOSE-RESPONSE OVERVIEW

1 For the quantification of noncancer risk, EPA has generally derived oral reference dose  
2 (RfD) and/or an inhalation reference concentration (RfC) values, which are “estimates, with  
3 uncertainty spanning perhaps an order of magnitude, of an exposure to the human population  
4 (including susceptible subgroups) that is likely to be without an appreciable risk of deleterious  
5 health effects over a lifetime” ([U.S. EPA, 2002b](#)). Although reference values are not associated with  
6 a quantified level of risk and provide no information about risks at higher or lower oral doses and  
7 air concentrations, the [NRC \(2013\)](#) recognized their importance to EPA’s program offices.

8 Reference values will therefore be derived, and an estimation of risk will be given at the  
9 reference value dose (see Section 5.5 for modeling details). For consideration of background  
10 intake, this approach necessitates the conversion of exposure information generally reported in the  
11 epidemiologic literature (e.g., drinking water concentrations) to intake doses (see Section 5.3). In  
12 deriving these intake dose estimates, EPA will consider all available and relevant study/population-  
13 specific routes of exposures, as well as the pertinent variabilities and uncertainties in factors that  
14 impact intake (dose) extrapolations and relative risk estimations (see Section 5.4).

15 For non-cancer outcomes, EPA will develop RfD and RfC values. These RfD or RfC values will  
16 preferably be derived using the Bayesian meta-regression methods (Section 5.3), but if infeasible  
17 due to data quality or poor model fits, a traditional BMD approach (i.e., selecting a single best model  
18 from individual dose-response datasets) will be used (Section 5.3). The assessment will also report  
19 the average daily occupational-only air exposures ( $\mu\text{g}/\text{m}^3$ ), and average daily lifetime air exposures  
20 ( $\mu\text{g}/\text{m}^3$ ) associated with the arsenic doses under the assumption that all dosing above background  
21 is from occupational air or lifetime air exposures, respectively<sup>9</sup>.

22 For priority cancer health outcomes, EPA will derive, upper-bound U.S. population-specific  
23 risk estimates with confidence intervals (that account for identified sources of variability and  
24 uncertainty to the extent the data can support such analyses) from epidemiological data over a  
25 broad range of inorganic arsenic intake doses ( $\mu\text{g}/\text{kg}\text{-day}$ ) above U.S. background levels (Sections  
26 5.3 and 5.4). If the dose-response relationships are deemed sufficiently linear to background levels  
27 of exposure in the U.S., those linear relationships will be provided so that approximations of the  
28 mean and upper-bound risks for cancer health outcomes can be derived. In cases of non-linear  
29 dose-response relationships, flexible polynomial approximations will be provided. The  
30 upper-bound linear relationships will be analogous to oral slope factor (OSF) and inhalation unit  
31 risk (IUR) estimates that EPA has historically provided for cancer risks. The OSF represents the  
32 upper-bound lifetime risk from chronic ingestion of a chemical per unit of mass consumed per unit  
33 body weight per day (expressed as  $[\mu\text{g}/\text{kg}\text{-day}]^{-1}$ ) and the IUR represents the upper-bound lifetime  
34 risk from chronic inhalation of a chemical per unit of air concentration (expressed as  $[\mu\text{g}/\text{m}^3]^{-1}$ ).

---

<sup>9</sup> Dietary sources of inorganic arsenic are still accounted for in this analysis as they are incorporated in the estimate of background exposure. In the calculation of risk from inhalation exposures, only the *extra* risk is assumed to come solely from inhalation

1 As discussed in previous sections, EPA will conduct dose-response analyses for all health  
2 outcomes identified as suitable given the results of the RRB analysis.

---

### 5.3. ESTIMATING A COMMON INTAKE DOSE FROM STUDY DATA

3 Study exposure information will be converted to a common intake dose metric ( $\mu\text{g}/\text{kg}\text{-day}$ )  
4 for use in dose-response analysis and for the purposes of a multiple study meta-regression analysis.  
5 The procedures and formulas for doing this vary with the multiple types of exposure metrics  
6 reported in studies. For example, when responses are reported in relation to well water  
7 concentrations the following formula applies.

$$8 \quad \text{dose} = DI + f \times (WCR \times WE) + (1 - f) \times (WCR \times LE) \quad (1)$$

9  $DI$  = dietary intake (average daily  $\mu\text{g}/\text{kg}$ );

10  $f$  = fraction of time (over lifetime up through the study) spent consuming well water  
11 (unitless);

12  $WCR$  = water consumption rate ( $\text{L}/\text{kg}$ );

13  $WE$  = well water concentration ( $\mu\text{g}/\text{L}$ ); and

14  $LE$  = low-end water concentration ( $\mu\text{g}/\text{L}$ ).

15 Values used would ideally come from study-specific data but could also be drawn from  
16 other suitable population-specific sources (e.g., exposure factors handbook). Monte Carlo analysis  
17 will be performed on assumed/estimated distributions for all exposure factors to characterize  
18 uncertainty.

---

### 5.4. VARIABILITY AND UNCERTAINTY IN DOSE-RESPONSE ANALYSES

19 Assessing variability and uncertainty is important in characterizing risk. Variability  
20 represents the diversity or heterogeneity of a factor that can influence the response within an  
21 individual or across a population. Uncertainty represents unavailable or incomplete information on  
22 a specific variable that can influence the analyses. Regarding variability, many factors are  
23 instrumental in determining an individual's risk from exposure, including concurrent background  
24 exposures to other chemicals and the individual's biological susceptibility due to genetic, lifestyle,  
25 health, and other factors ([US EPA, 1992](#)). In turn, population responses to chemical exposures  
26 depend on the distribution of these varying individual determinants in the population, including by  
27 life stage. The *IRIS Toxicological Review of Inorganic Arsenic* relies on observational epidemiological  
28 data for the dose-response analysis; Section 3.3 provides more details on how variability and  
29 uncertainty were considered and addressed in the dose-response analyses for inorganic arsenic.

1 To convert study-specific exposure metrics to intake dose estimates used in the  
2 dose-response analyses (see Section 5.3), each study was subjected to a complex Monte Carlo  
3 analysis to simulate the impact of uncertainty and variance on key inputs that factor into the  
4 extrapolation of exposure metrics to  $\mu\text{g}/\text{kg}\text{-day}$  dose; for example, some studies might report  
5 arsenic concentrations for a particular route of exposure (e.g., drinking water) but not consider  
6 contribution from other sources such as dietary or inhalation exposure; other studies might report  
7 arsenic exposure concentrations from a particular source (e.g., a community water supply) rather  
8 than individual exposure levels. Furthermore, these source concentrations might be estimated  
9 from samples taken over a limited period or a single time point and extrapolated to lifetime  
10 exposures. Therefore, studies where exposure was determined on the individual level are assumed  
11 to introduce less uncertainty to associations between health effects and inorganic arsenic than  
12 those that used community measures of exposure.

13 Aspects of exposure characterization are relevant to the use of such data in dose-response  
14 analyses. For estimating total daily exposure, the National Research Council (NRC) indicated that  
15 exposure routes (i.e., drinking water, diet, air, smoking) should be characterized, preferably using  
16 probabilistic approaches ([NRC, 2013](#)). In response to this recommendation, EPA has qualitatively  
17 and, where possible, quantitatively delineated between routes of exposure and considered  
18 information provided by biomarkers of exposure. Studies conducted on U.S. populations and other  
19 populations (e.g., Taiwanese, Bangladeshi) have been evaluated for hazard identification and a  
20 determination will be made on whether an adjustment in estimated dose-response behavior in the  
21 U.S. population is warranted.

---

## 5.5. DOSE-RESPONSE MODELING APPROACHES

22 Multiple separate dose-response analyses will be conducted for the inorganic arsenic  
23 assessment. Dose-response analyses will be performed on health outcomes with *robust* or  
24 *moderate* evidence reporting an association between arsenic exposure and effect, or those  
25 considered important for Agency benefit-cost analyses. The dose-response modeling approaches  
26 used for this Toxicological Review are described as three approaches. The first step in all cases is  
27 the conversion of all exposure information to a single intake dose metric ( $\mu\text{g}/\text{kg}\text{-day}$ ) and the  
28 adjustment of responses to account for covariates. If study data are sufficient, the first approach  
29 attempted will use a meta-regression multiple study analysis. If warranted (e.g., for the purposes of  
30 determining model uncertainty associated with a given study data set), model averaging methods  
31 may be applied. If those methods are not feasible, appropriate, or applicable, an analysis of  
32 individual studies using a traditional benchmark-dose approach, in which a single “best” model is  
33 chosen, will be attempted after converting the individual study exposure data to internal dose  
34 estimates.

35 As illustrated in Table 5-4, the model averaging and meta-regression analyses will differ  
36 from the more simplified single study, single model dose-response analyses regarding the types of

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- 1 study data analyzed (individual instead of grouped data), the numbers of studies evaluated (use of
- 2 multiple study meta-analyses, where feasible), and the complexity of the models employed.

**Table 5-4. Summary of proposed inorganic arsenic dose-response methods**

<b>Dose-response element</b>	<b>Approach</b>	<b>Meta-regression</b>	<b>Model averaging</b>	<b>Single study, single model</b>
<b>Type of study data</b>	Grouped exposure, outcome, or both	✓	✓	✓
	One study data set at a time		✓	✓
	Multiple study data sets (meta-analysis and similar)	✓		
<b>Dosimetry</b>	Use estimates of intake dose that considers exposures from multiple routes obtained from multiple published sources	✓	✓	✓
	Use biomarker data	✓	✓	✓
	Intraconversion of intake/biomarker metrics based on empirical data, physiologically based pharmacokinetic models	✓	✓	✓
<b>Dose-response model forms</b>	Standard parametric models (Poisson regression, benchmark dose-type models, etc.)		✓	✓
	Complex parametric and nonparametric models (random effects, etc.)	✓		
<b>Dose-response modeling methods</b>	Conventional (primarily maximum likelihood estimate)		✓	✓
	Bayesian (Markov Chain Monte Carlo)	✓		
	Model averaging		✓	
<b>Output risk metrics</b>	Points of departure, risk-specific doses, low-dose slope factors, or equivalent			✓
	Model-based risk estimates	✓	✓	
	Fully probabilistic risk estimates	✓		
<b>Uncertainty and variability</b>	Risk for subpopulations based on quantitative estimates of sensitivity (absorption, distribution, metabolism, excretion, etc.)	✓	✓	✓
	Probabilistic modeling of exposure, pharmacokinetic, and prior distribution uncertainty as supported by data	✓		
<b>Low-dose extrapolation</b>	Within range of study data			✓
	Statistical confidence limits on predicted risks	✓	✓	

3

## ***Systematic Review Protocol for the Inorganic Arsenic IRIS Assessment***

1           The meta-regression dose-response analysis will use Bayesian analyses based on data from  
2 multiple studies, where possible, to derive fully probabilistic risk estimates. In analyzing bladder  
3 cancer, lung cancer, and diseases of the circulatory system, EPA will apply model averaging, meta-  
4 regression and single-study, best model dose-response analyses. The hierarchical Bayesian  
5 approach encompassed in the meta-regression method will be the focus of the assessment. The  
6 logistic model used thus far for modeling epidemiologic data in the meta-regression approach  
7 makes no assumption regarding the shape of the dose-response curve (linear vs. nonlinear) or  
8 whether a threshold exists in the dose-response relationship, meaning it can adequately describe  
9 threshold and non-threshold dose-response curves. However, it does not allow for a change in the  
10 dose-response direction (e.g., “J”- or “U”-shaped dose-response curves). Also, using multiple  
11 epidemiologic studies consisting of different populations and life stages with different levels and  
12 magnitudes of susceptibilities tends to linearize the dose-response relationship in the low-dose  
13 region.

14           A distinguishing feature of the meta-regression approach is the use of Bayesian (Markov  
15 Chain Monte Carlo) approaches to generate distributional outputs based on the data and the  
16 assumed prior probabilities for models and distributions of model parameters. Depending on data  
17 availability, EPA will analyze the impact of latency, potentially sensitive subgroups, children, who  
18 have greater intake of water and food per body weight than adults, or groups with higher  
19 nondietary levels of exposure (e.g., smokers). EPA will also use (where possible or needed)  
20 empirical data or physiologically based pharmacokinetic models to compare studies that present  
21 risks as a function of exposure with those that present risks as a function of biomarkers, such as  
22 urinary arsenic. Additionally, the hierarchical Bayesian method used for the meta-regression  
23 allows for the analysis of case-control and cohort studies, as well as low-dose and high-dose  
24 studies, simultaneously. Finally, an approach to estimate the lifetime risk of developing the disease  
25 of interest due to inorganic arsenic exposure will be utilized in the assessment. This approach,  
26 called the life table approach, estimates the probability that an individual, exposed over an entire  
27 lifetime, will develop the disease of interest, accounting for the background probability of  
28 developing the disease (i.e., probability of developing the disease at the background level of  
29 inorganic arsenic exposure). This life table-based extrapolation used age-stratified U.S. all-cause  
30 mortality and disease-specific morbidity and mortality statistics, and as such is conceptually a  
31 method to extrapolate risks estimated in the studies used in the meta-regression to lifetime risks in  
32 the general U.S. population. With respect to smoking, EPA will account for the potential increases in  
33 arsenic exposure via cigarette smoke in two stages of the meta-regression: (1) as part of the  
34 probabilistic dose conversions and (2) when estimating the U.S. background exposure level to  
35 arsenic for use in the life table extrapolations.

36           However, the updated meta-regression dose-response modeling approach EPA intends to  
37 apply will expand on the Bayesian approaches previously applied through the application of a  
38 fractional logistic model. This model will allow more flexibility in fitting data sets and could easily

1 be implemented in the Bayesian framework. The major conceptual advantage to using  
2 fractional-polynomial forms of the logistic model is that nonmonotonic dose-response curves  
3 (curve shapes that can change direction) could be considered. This may be useful for inorganic  
4 arsenic to test whether observed data support the hypothesis that low doses of arsenic may reduce  
5 the risk of some health outcomes ([Tsuji et al., 2019](#); [Zhou and Xi, 2018](#); [Lamm et al., 2015](#); [Tsuji et](#)  
6 [al., 2014](#); [Cohen et al., 2013](#); [Mink et al., 2008](#); [Abernathy et al., 1996](#)). A fractional logistic model  
7 can be parameterized such that this behavior, if it exists (i.e., the model can result in negative slopes  
8 in the low dose region), can be fit adequately.

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## 5.6. EXTRAPOLATION FOR DOSE-RESPONSE ANALYSES

9 In addition to using observed data to characterize dose-response relationships, NRC also  
10 recommended limited extrapolation of fitted models to within an order of magnitude of the  
11 observed data. Model choices planned for the current analysis allow for nonlinear or threshold  
12 phenomena, as supported by the data. NRC further recommended characterizing dose-response  
13 relationships down to (but not necessarily below) background levels, estimated to be 1–5 µg/L  
14 inorganic, monomethyl, and dimethyl arsenic forms of arsenic in urine for U.S. populations. NRC  
15 indicated that the risks below background concentrations should be characterized to the extent  
16 feasible but also assumed the needs of risk assessors would be met if risk can be characterized  
17 down to background concentrations. Extrapolations in the Toxicological Review will be informed  
18 by these recommendations, and a life table approach will be used in conjunction with the Bayesian  
19 meta-regression to extrapolate risks to the general U.S. population. The life table analysis will use  
20 current information on all-cause mortality, and the lifetime incidence and mortality rates of the  
21 diseases under consideration.

## 6. PROTOCOL HISTORY

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1 Release date: 5/28/2019

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51

## APPENDIX A. ANALYSIS OF MODES OF ACTION COMMON TO MULTIPLE HEALTH EFFECTS

### A.1. BACKGROUND

1 EPA defines mode of action (MOA) as “a sequence of key events and processes, starting with  
2 the interaction of an agent with a cell, proceeding through operational and anatomical changes, and  
3 resulting in cancer formation [or other adverse outcomes]” ([U.S. EPA, 2005a](#)). The principles of the  
4 2001 World Health Organization’s (WHO’s) International Programme on Chemical Safety (IPCS)  
5 Framework were incorporated into the EPA 2005 Cancer Guidelines. In addition to the IPCS  
6 principles, EPA Cancer Guidelines also incorporated standards from the *Framework for Human  
7 Relevance Analysis of Information on Carcinogenic Modes of Action*, published by members of the  
8 International Life Sciences Institute Risk Science Institute ([Meek et al., 2003](#)). These principles are  
9 outlined in Section 2.4: MOA Framework Guidelines of the EPA Cancer Guidelines document and  
10 provide guidance for developing MOA analyses. The guidelines state that “mode of action  
11 conclusions should be [are] used to address the question of human relevance of animal tumor  
12 responses, to address differences in anticipated response among humans, such as between children  
13 and adults or men and women; and as the basis of decisions about the anticipated shape of the  
14 dose-response relationship” [see Sections 2.4.2.2 and 2.4.3.4 of [U.S. EPA \(2005a\)](#)].

15 The Integrated Risk Information System (IRIS) Program routinely conducts MOA analyses  
16 to inform hazard identification and dose-response analysis, but a complete understanding of MOA  
17 is not required to develop hazard conclusions or toxicity values. In the case of arsenic, the National  
18 Research Council (NRC) recommended EPA conduct MOA analyses to facilitate understanding of  
19 exposure-response relationships and interindividual variabilities for health outcomes where  
20 extrapolation to below the observed range may be necessary. However, the NRC also recognized  
21 that it was not clear whether such an analysis would be feasible.

22 A MOA analysis was considered less effective for hazard characterization given the  
23 abundance of epidemiological evidence, including at low levels of exposure, and recognition that  
24 data from animal studies of inorganic arsenic are of limited applicability for dose-response analysis  
25 in human health risk assessment ([ATSDR, 2007](#)).

26 This appendix describes the analyses conducted by EPA to characterize MOAs associated  
27 with arsenic exposure, focusing on MOAs common to multiple adverse health effects versus  
28 tissue-specific descriptions. As will become evident, recognized MOAs for any of the hypothesized  
29 bases for inorganic arsenic (iAs)-induced disease are incomplete, poorly populated with key events,  
30 and/or nonspecific. This prevents a critical evaluation of dose-response relationships, particularly  
31 in the low-dose region.

1           The mechanisms of arsenic-associated disease induction are complex. Evidence suggests  
2 arsenic induces massive aberrant gene expression and dysregulates cell growth and proliferation,  
3 differentiation, and antioxidant defense ([Ren et al., 2015](#); [Bustaffa et al., 2014](#); [Medeiros et al.,  
4 2012](#)). Global gene expression is substantially altered in individuals following arsenic exposure  
5 ([Bustaffa et al., 2014](#); [Bourdonnay et al., 2009 1030465](#); [Andrew et al., 2008](#)). Global DNA  
6 hypomethylation and focal DNA hypermethylation are both implicated in arsenic-induced  
7 malignant transformation in vivo and in vitro ([Chanda et al., 2006](#); [Benbrahim-Tallaa et al., 2005](#)).  
8 Arsenic exposure also has been linked to histone modifications in vitro and in circulating leukocytes  
9 collected from chronically exposed humans ([Ge et al., 2013 1797778](#); [Chu et al., 2011](#); [Zhao et al.,  
10 2010](#); [Jo et al., 2009b](#)) and to altered microRNA expression ([Ren et al., 2015](#); [Martínez-Pacheco et  
11 al., 2014](#); [Shan et al., 2013](#); [Li et al., 2012](#); [Ren et al., 2011](#); [Wang et al., 2011](#)). The various MOAs  
12 appear interrelated and are likely to be involved in both cancer and noncancer outcomes.  
13 Interrelated MOAs discussed in this appendix include:

- 14       • Reactive oxygen species (ROS) generation and oxidative stress responses
- 15       • As(III) binding to thiol groups and inhibition of key enzymes
- 16       • As(V) inhibition of oxidative phosphorylation (As[V] structural analog of phosphate)
- 17       • Cell cycling and damage repair impairment
- 18       • Epigenetics
- 19       • Endocrine disruption
- 20       • Cytotoxicity and regenerative proliferation

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## **A.2. MODE-OF-ACTION ANALYSES**

### **A.2.1. Hypothesized Mode of Action (MOA): Reactive Oxygen Species (ROS) Generation and Oxidative Stress**

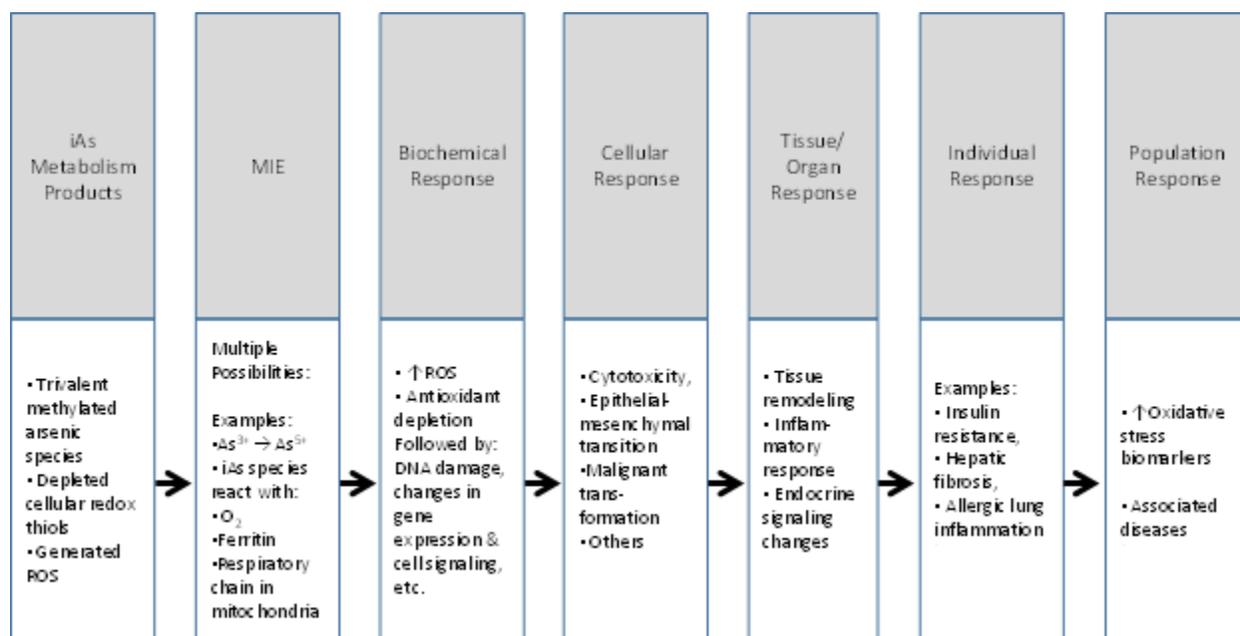
21 ***Relevant Health Effects: Cardiovascular Disease, Diabetes, Liver Disease, Lung Cancer, Bladder***  
22 ***Cancer, Neurotoxicity, Nonmalignant Respiratory Disease, Pregnancy Outcomes, Renal***  
23 ***Disease, Skin Cancer, and Skin Lesions.***

24           Mammalian metabolism of inorganic arsenic involves a cascade of oxidation-reduction  
25 (redox) reactions, the net results of which are (1) generation of trivalent methylated species,  
26 (2) depletion of cellular thiols that are involved in maintaining cellular redox balance, and (3) the  
27 generation of ROS. Several adverse health effects following exposure to inorganic arsenic may thus  
28 result from events mediated by oxidative stress ([Flora, 2011](#); [Jomova et al., 2011](#); [Kitchin and](#)

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1 [Conolly, 2010](#)) (see Figure A-1). The molecular initiating event (MIE) in this MOA is a topic of  
2 ongoing research but likely includes one of the following: (1) intermediate arsine species  
3 (e.g., dimethylarsine) react with molecular oxygen, (2) methylated arsenic species react with  
4 ferritin, (3) arsenite oxidizes to arsenate, and (4) inorganic arsenic interacts with complexes in the  
5 mitochondrial electron transport chain and/or antioxidant enzymes (e.g., nicotinamide adenine  
6 dinucleotide phosphate-oxidase [NADPH oxidase]) ([Li et al., 2014](#); [Flora, 2011](#)).

7 While multiple MIEs are possible for this MOA, each one will result in a biochemical  
8 response that consists of perturbing the redox balance in the cell through (1) generation of ROS  
9 (e.g., superoxide, H<sub>2</sub>O<sub>2</sub>, hydroxyl radical) and (2) depletion of antioxidant defenses (e.g., glutathione  
10 [GSH], ascorbate, superoxide dismutase) ([Flora, 2011](#); [Jomova et al., 2011](#); [Kitchin and Conolly,  
11 2010](#); [De Vizcaya-Ruiz et al., 2009](#)). A variety of markers of oxidative stress have been measured in  
12 in vitro cell systems at concentrations in the low μM range, and in animal studies in the low  
13 mg/kg-day ranges (0.5–1.7 mg/kg).



**Figure A-1. Hypothesized mode of action for effects mediated by oxidative stress.**

Note: Figure shows key events from the initial molecular interaction through a possible population-level response. Arrows link each key event (e.g., individual responses lead to population responses), but do not necessarily link each specific example response (e.g., insulin resistance is not linked to all the diseases included in the table in Section A.3.). As the assessment development process moves forward, additional evidence may provide a better understanding of the key events in this MOA and the connections between them.

14 Numerous biochemical responses can occur within cells following the generation of ROS  
15 and depletion of antioxidant defenses, including changes in protein expression, enzyme activity,

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1 lipid oxidation, DNA damage, gene expression, and cell signaling. For instance, alterations in  
2 protein expression levels have been observed in multiple tissue types. While observations of  
3 increased protein expression levels related to antioxidant defense (e.g., Cu/Zn superoxide  
4 dismutase [SOD], nuclear factor [erythroid-derived 2]-like 2 [Nrf2]) ([Zhao et al., 2012](#); [Zheng et al.,  
5 2012](#); [Li et al., 2011](#)) and DNA repair (e.g., DNA polymerase  $\beta$ ) ([Snow et al., 2005](#)) may occur across  
6 multiple cell types, other observations of elevated protein levels may be cell-specific (e.g., platelet  
7 endothelial cell adhesion molecule) ([Straub et al., 2008](#)).

8 For many of the biochemical responses noted above, the concentration and duration of  
9 inorganic arsenic exposure, and subsequent redox imbalance, may influence the ultimate cellular  
10 response. Based on the literature reviewed, there may be a pattern of generally adaptive cellular  
11 responses (e.g., increases in DNA base excision repair genes and antioxidant enzymes) at relatively  
12 low exposures (e.g., 0.1–1  $\mu$ M iAs), whereas higher concentrations may result in adverse cellular  
13 responses (e.g., decreases in DNA excision repair proteins) ([Snow et al., 2005](#)). The exposure at  
14 which disruption of cellular homeostasis occurs varies greatly across cell lines, and thus the specific  
15 concentration range that confers adaptive versus adverse cellular responses is a topic of ongoing  
16 research ([Clewell et al., 2011](#); [Flora, 2011](#); [Gentry et al., 2010](#)). Similarly, the changes in protein  
17 expression, enzyme activity, or DNA damage can be very time dependent [e.g., elevated DNA repair  
18 enzyme activity at  $\leq$ 48 hours of inorganic arsenic exposure, compared with basal activity levels  
19 after 72–120 hours exposure; [Snow et al. \(2005\)](#)] ([Medeiros et al., 2012](#); [Clewell et al., 2011](#); [Eblin  
20 et al., 2008](#); [Eblin et al., 2006](#)).

21 Separate from the consideration of exposure duration is the duration of a biochemical  
22 response that inorganic arsenic may elicit in a cell. Two aspects of response duration are important  
23 to examine. First, short-lived, reversible responses such as elevated ROS levels likely lead to  
24 distinct outcomes from prolonged, irreversible responses such as DNA damage or epigenetic  
25 alterations that persist after inorganic arsenic exposure is stopped ([Flora, 2011](#); [Wnek et al., 2009](#)).  
26 Second, inorganic arsenic exposure may modulate the natural duration of a response, thus turning  
27 an adaptive response to an adverse response. For instance, evidence suggests that inorganic  
28 arsenic exposure may result in prolonged activation of the Nrf2 transcription factor pathway  
29 compared to when the pathway is activated by natural compounds (e.g., sulforaphane,  
30 tert-butylhydroquinone) ([Lau et al., 2013](#)). The Nrf2 pathway is activated by oxidative stress and  
31 plays a key role in antioxidant defense; however, prolonged activation of the Nrf2 pathway can lead  
32 to sustained cell growth and is associated with cancer in several tissues (e.g., breast, bladder, skin)  
33 ([Lau et al., 2013](#)). Recent data indicate that inorganic arsenic exposure may mimic constitutive  
34 Nrf2 activation found in several tumor types ([Lau et al., 2013](#)).

35 Similar to observations of prolonged Nrf2 activation, data also suggest that inorganic  
36 arsenic promotes stabilization of the transcription factor HIF-1 $\alpha$ , thus leading to prolonged  
37 transcriptional activation of downstream targets (e.g., vascular endothelial growth factor [VEGF])  
38 ([Li et al., 2014](#)). Downstream targets of HIF-1 $\alpha$  can play a key role in malignant transformation and

1 carcinogenesis by promoting angiogenesis, dedifferentiation, and glycolysis ([Li et al., 2014](#)).  
2 Prolonged HIF-1 $\alpha$  activation following inorganic arsenic exposure is dependent on increases in ROS  
3 produced primarily by the mitochondrial electron transport chain, possibly through inorganic  
4 arsenic activation of NADPH oxidase at the cell surface ([Li et al., 2014](#)). Together with data on Nrf2  
5 activation, evidence that inorganic arsenic perturbs HIF-1 $\alpha$  transcriptional activity via ROS  
6 production provides insight on how subsequent changes at the cellular or tissue/organ levels may  
7 be quite distinct despite being initiated through a common MOA.

**A.2.2. Hypothesized Mode of Action (MOA): Binding of As(III) to Thiol Groups and Inhibition of Key Enzymes**

8 ***Relevant Health Effects: Multiple Outcomes***

9 Inorganic arsenic binds to vicinal sulfhydryl groups in proteins and low-molecular-weight  
10 compounds such as amino acids and peptides ([NRC, 1999](#)). It has been shown that at high  
11 concentrations (6.3 to 381 mM) inorganic arsenic can bind to various enzymes, including DNA  
12 repair enzymes and GSH metabolism-related enzymes, resulting in enzyme inhibition ([Snow et al.,](#)  
13 [1999](#); [Hu and Snow, 1998](#)).

**A.2.3. Hypothesized Mode of Action (MOA): As(V) Inhibition of Oxidative Phosphorylation (As[V] structural analog of phosphate)**

14 ***Relevant Health Effects: Multiple Outcomes***

15 In the cell, physicochemical similarities between As(V) and phosphate result in substitution  
16 of As(V) in a variety of chemical reactions in which phosphate would be the normal substrate.  
17 These reactions are commonly referred to as arsenolytic in that the substitution of As(V) for  
18 phosphate forms a compound that is inherently unstable ([Hughes et al., 2011](#)). For example,  
19 As(V)-containing esters that are readily formed as homologs of phosphate esters are quickly  
20 degraded. Although As(V)-containing esters are inherently unstable, the formation of these  
21 compounds, typically at 100–200  $\mu$ M in vitro, can disrupt normal phosphate metabolism in cells  
22 ([Németi et al., 2010](#); [Gregus et al., 2009](#)).

**A.2.4. Hypothesized Mode of Action (MOA): Epigenetics<sup>10</sup>**

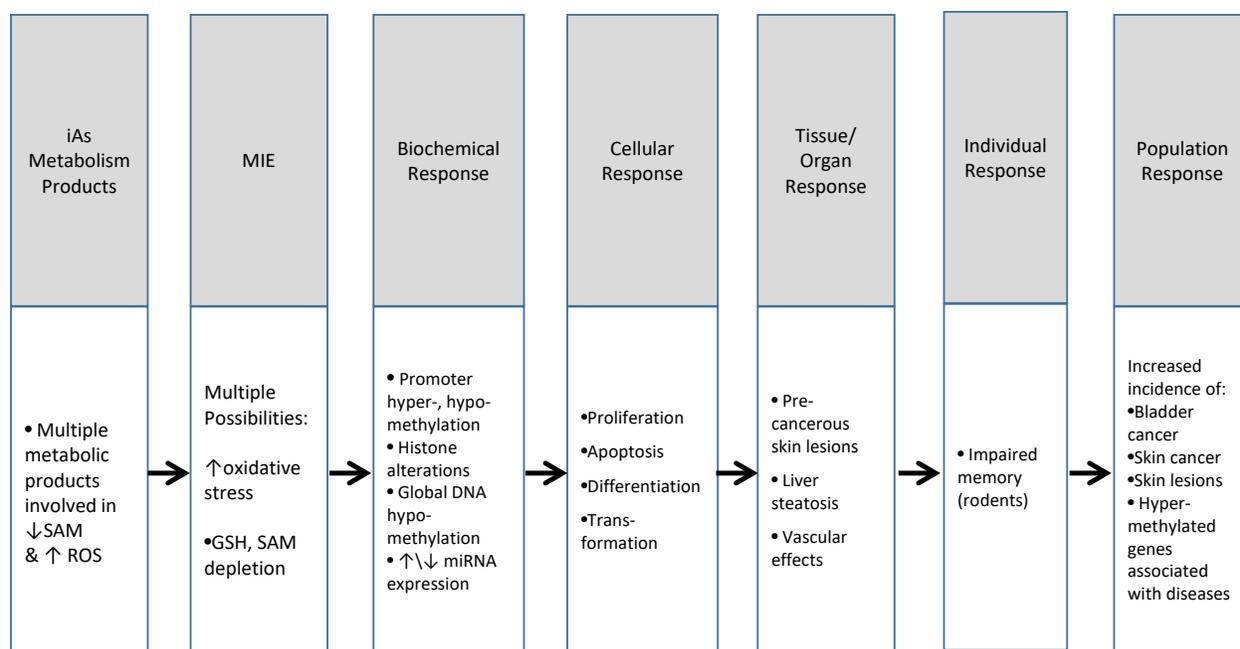
**1 *Relevant Health Effects: Bladder Cancer, Skin Cancer, Skin Lesions***

2 As detailed below, several studies were identified that indicate epigenetic mechanisms may  
3 mediate some of the adverse health effects associated with exposure to inorganic arsenic (see  
4 Figure A-2). It has been suggested that the depletion of glutathione and S-adenosylmethionine  
5 (SAM) during cellular metabolism of inorganic arsenic species are important MIEs of this MOA  
6 ([Martínez et al., 2011](#); [Ren et al., 2011](#); [Reichard and Puga, 2010](#)). In addition, inorganic arsenic can  
7 also elevate levels of ROS, which may in turn deplete SAM, in conjunction with or separately from,  
8 SAM depletion that results from inorganic arsenic methylation. Specifically, some evidence  
9 suggests that the depletion of GSH due to elevated oxidative stress results in shunting S-adenosyl  
10 homocysteine away from the synthesis of SAM in order to replenish GSH through the  
11 trans-sulfuration pathway, inducing a shortage of methylation cofactors ([Reichard and Puga, 2010](#)).  
12 Consistent with these findings and with multiple observations of GSH depletion, some investigators  
13 interpret the downstream epigenetic changes associated with inorganic arsenic exposure as mainly  
14 resulting from oxidative stress effects [[Kitchin and Conolly \(2010\)](#); see Oxidative Stress MOA  
15 Summary A.2.1.].

16 The depletion of SAM may lead to one of the most well studied of arsenic-associated  
17 epigenetic effects at the biochemical response level, namely, changes in DNA methylation patterns.  
18 Like arsenic (III) methyltransferase (AS3MT), DNA methyltransferases (collectively, DNMTs) also  
19 use SAM as a methyl donor. Therefore, reduced cellular SAM levels from increased AS3MT activity  
20 could lead to reduced DNA methylation. Several studies have found reduced levels of DNMT  
21 activity or expression in arsenic-exposed cell lines ([Reichard et al., 2007](#); [Benbrahim-Tallaa et al.,](#)  
22 [2005](#); [Zhao et al., 1997](#)). The observed changes in RNA expression levels suggest that factors in  
23 addition to SAM depletion may be responsible for changes in DNMT activity ([Reichard and Puga,](#)  
24 [2010](#)).

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<sup>10</sup>From [Argos \(2015\)](#): “DNA methylation is an epigenetic event with a hypothesized role in gene expression, development, and disease ([El-Osta and Wolffe, 2000](#)). In humans, methylation is typically of the DNA base cytosine, which is modified reversibly by adding a methyl group (–CH<sub>3</sub>) to its 5-carbon position ([Herman and Baylin, 2003](#)). This modification occurs on cytosines that precede a guanosine in the DNA sequence, referred to as the CpG dinucleotide. Short regions of 0.5–4 kb in length, known as CpG islands, are rich in CpG content. These islands are typically found in or near promoter regions of genes where transcription is initiated. In normal somatic cells, the vast majority of CpG dinucleotides in the genome are methylated, whereas CpG islands often remain unmethylated, allowing gene expression to occur. Whereas in disease pathways, this pattern of CpG methylation is thought to be disrupted, with increased methylation within promoter regions of genes causing abnormal gene silencing, in addition to global hypomethylation of genomic DNA, which promotes chromosomal instability, translocation and gene disruption ([Esteller, 2007](#)). Unlike CpG island regions, there is greater biologic variability in methylation of CpG dinucleotides in CpG shores (within 2 kb of a CpG island), CpG shelves (2–4 kb from a CpG island), as well as isolated CpG loci in the genome ([Ziller et al., 2013](#)). DNA methylation levels are influenced by various factors including genetic, environmental, and dietary factors ([Mckay et al., 2012](#); [Philibert et al., 2012](#); [Siedlinski et al., 2012](#)).”



**Figure A-2. Hypothesized mode of action for epigenetic mechanisms underlying associated health effects of inorganic arsenic exposures.**

miRNA = microRNA.

Note: The figure shows a high-level summary of key events from the initial molecular interaction through a possible population-level response. The arrows link each key event (e.g., individual responses lead to population responses) but do not necessarily link each specific example response (e.g., impaired memory is not linked to skin cancer). Note particularly that individual-level evidence for this MOA includes only effects related to impaired memory, even though population-level responses indicate effects in other systems (e.g., bladder, skin). As the assessment development process moves forward, additional evidence may provide better understanding of the key events in this MOA and the connections between them.

See summary text and table for references; figure based on [Ankley et al. \(2010\)](#).

Note: Figure shows a high-level summary of key events from the initial molecular interaction through a possible population-level response. The arrows link each key event (e.g., individual responses lead to population responses), but do not necessarily link each specific example response (e.g., impaired memory is not linked to skin cancer). Particularly note for this MOA that evidence at the individual level was only identified for effects related to impaired memory, even though population level responses indicate effects in other systems (e.g., bladder, skin). As the assessment development process moves forward, additional evidence may provide better understanding of the key events in this MOA and the connections between them.

- 1 Sufficiently reduced DNMT activity would likely inhibit cells' ability to maintain normal
- 2 DNA methylation pattern and reduce the overall extent of DNA methylation. Global DNA
- 3 hypomethylation after inorganic arsenic exposure has indeed been observed in a range of in vivo
- 4 and in vitro studies (45–150 ppm iAs in vivo; 125 nM to 100 μM iAs in vitro) ([Pilsner et al., 2012](#);
- 5 [Coppin et al., 2008](#); [Reichard et al., 2007](#); [Benbrahim-Tallaa et al., 2005](#); [Chen et al., 2004](#);
- 6 [Sciandrello et al., 2004](#); [Xie et al., 2004](#); [Chen et al., 2001](#); [Zhao et al., 1997](#)) (see Table A-3). As an
- 7 example, treatment of human prostate epithelial cells, (RPWE-1) with 5 μM iAs for either 16 or
- 8 29 weeks resulted in hypomethylation ([Coppin et al., 2008](#); [Benbrahim-Tallaa et al., 2005](#)).

1 Reduced DNMT activity and SAM depletion were seen in some, but not all, of these studies. A small  
2 number of studies have also reported global DNA hypermethylation in human populations at  
3 ranges of arsenic exposure ranging from 2–500 µg/L ([Majumdar et al., 2010](#); [Pilsner et al., 2007](#))  
4 and in animals at exposures ranging from 45–150 ppm iAs ([Chen et al., 2004](#); [Xie et al., 2004](#)).

5 A second major epigenetic response to inorganic arsenic exposure that the literature  
6 identifies is histone protein modifications. Histone proteins maintain the structure of chromatin  
7 and play an important role in gene transcription and repression. The most well-studied chemical  
8 modification of histones in response to inorganic arsenic exposure are changes in acetylation and  
9 methylation at concentrations as low as 1 µM, but evidence also shows an association between  
10 inorganic arsenic and increased histone phosphorylation ([Ren et al., 2011](#)).

11 An increasing body of evidence suggests that microRNA expression is altered in response to  
12 inorganic arsenic exposure ([Kaul et al., 2014](#); [Rager et al., 2014](#); [Li et al., 2012](#); [Cao et al., 2011](#);  
13 [Marsit et al., 2006a](#)) (see table in Appendix A.3). MicroRNAs, which generally suppress the  
14 translation of mRNA into protein and enhance mRNA degradation, are both upregulated and  
15 downregulated (often in the same model system) after inorganic arsenic exposure. Recent  
16 evidence links altered microRNA expression to downstream effects and adverse events.

17 While individual variation in responses has been widely reported after inorganic arsenic  
18 exposure, there are relatively few studies linking responses at the individual level to epigenetic  
19 changes. As discussed below, there are some data connecting health effects associated with  
20 inorganic arsenic exposures and epigenetic changes in population-based studies. One study on  
21 response at the individual level in animals did evaluate inorganic arsenic-induced epigenetic  
22 changes in relation to cognitive function and found contextual memory deficits in rats exposed  
23 during gestation and early postnatal development ([Martínez et al., 2011](#)). [Martínez et al. \(2011\)](#)  
24 studied epigenetic modifications in Wistar rats resulting from arsenic exposure. In brief, Wistar  
25 rats were exposed to arsenic via drinking water at 3 and 36 ppm from gestation to 4 months of age.  
26 DNA methylation patterns in brain cells of the hippocampus and frontal cortex were then assessed.  
27 The results showed that arsenic altered methylation patterns in the cortex and hippocampus of  
28 exposed animals compared with controls starting at 1 month. The altered patterns of methylation  
29 in animals exposed to arsenic at 3 and 36 ppm correlated with progressive and dose-dependent  
30 aberrant memory effects ([Martínez et al., 2011](#)).

31 Based on available mechanistic and in vivo studies, a range of factors affecting individual  
32 variations in susceptibility may relate to epigenetic mechanisms underlying adverse health effects  
33 of inorganic arsenic exposures (see table in Appendix A.3). These include dietary deficiencies, life  
34 stage susceptibility, gender, genetics, and smoking. Several studies have investigated the  
35 relationships between dietary sufficiency and epigenetic changes associated with inorganic arsenic  
36 exposure. Low folate status has been associated with the development of skin lesions in  
37 Bangladeshi adults ([Pilsner et al., 2007](#)), as well as Hras-promoter DNA hypomethylation, steatosis,  
38 and microgranulomas in the livers of mice exposed to inorganic arsenic ([Okoji et al., 2002](#)). While

1 the proposed epigenetic MOAs suggest that dietary intake of methionine and folate would positively  
2 correlate with DNA methylation, conflicting evidence has been reported. Associations between  
3 increases in DNA methylation and inorganic arsenic exposure were only observed in individuals  
4 with adequate folate status ([Pilsner et al., 2007](#)). Moreover, [Lambrou et al. \(2012\)](#) found that the  
5 exposure-response relationship between inorganic arsenic exposure and changes in DNA  
6 methylation in *Alu* retrotransposon elements (thought to be involved in cancer and other diseases)  
7 varied depending on folate intake. Study subjects were elderly males from the Normative Aging  
8 Study whose arsenic exposures had been relatively low (iAs concentrations ranging from 0.02 to  
9 1.45 µg/g as measured in toenails). Evidence also suggests adverse effects related to folate  
10 supplementation and subsequent high fetal exposure to reactive As metabolites: reduced fetal  
11 weights and altered fetal liver DNA methylation were observed after in utero exposure from mouse  
12 dams fed a high folate diet ([Tsang et al., 2012](#)).

13 Efforts to identify susceptible life stages for epigenetic effects of iAs exposure have largely  
14 focused on In utero exposures. Studies in humans and rodents have detected DNA  
15 hypomethylation ([Martínez et al., 2011](#); [Waalkes et al., 2004a](#)) and numerous DNA methylation  
16 changes at specific loci ([Tsang et al., 2012](#)). Interestingly, the analysis of cord blood of inorganic  
17 arsenic-exposed mothers revealed the upregulation of 12 microRNAs (miRNAs) linked to cancer,  
18 diabetes, and immune response signaling pathways ([Rager et al., 2014](#)). Additionally, Rojas et al.  
19 ([2015](#)) identified functional changes associated with CpG methylation.

20 The susceptible individual responses linked to genetic factors in different populations may  
21 shed light on population responses associated with the epigenetic mechanisms of inorganic  
22 arsenic-induced adverse health outcomes. In addition, changes in DNA methylation patterns  
23 (hyper- or hypomethylation) have been identified in humans with skin and bladder cancers in  
24 arsenic-endemic areas (arsenic exposure concentrations were 0.26 µg/g as measured in toenail  
25 samples of skin cancer patients and 50 µg/L iAs in drinking water in bladder cancer patients)  
26 ([Chanda et al., 2006](#); [Marsit et al., 2006b](#)). [Pilsner et al. \(2009\)](#) found a relationship between global  
27 DNA hypomethylation at 121 µg/L in urine and the risk of inorganic arsenic-induced skin lesions.  
28 [Smeester et al. \(2011\)](#) identified 182 genes with promoter regions consistently hypermethylated in  
29 a Mexican population with arsenicosis symptoms (skin lesions) in individuals exposed to a mean  
30 iAs of 110 µg/L. Notably, the study authors identified a network of 17 highly methylated tumor  
31 suppressor and related genes (the “suppressome”) and suggested that downregulation of these  
32 genes increased the risk of inorganic arsenic-associated adverse effects. These changes in DNA  
33 methylation patterns could serve as an MIE in the overall iAs MOA.

#### **A.2.5. Hypothesized Mode of Action (MOA): Endocrine Disruption**

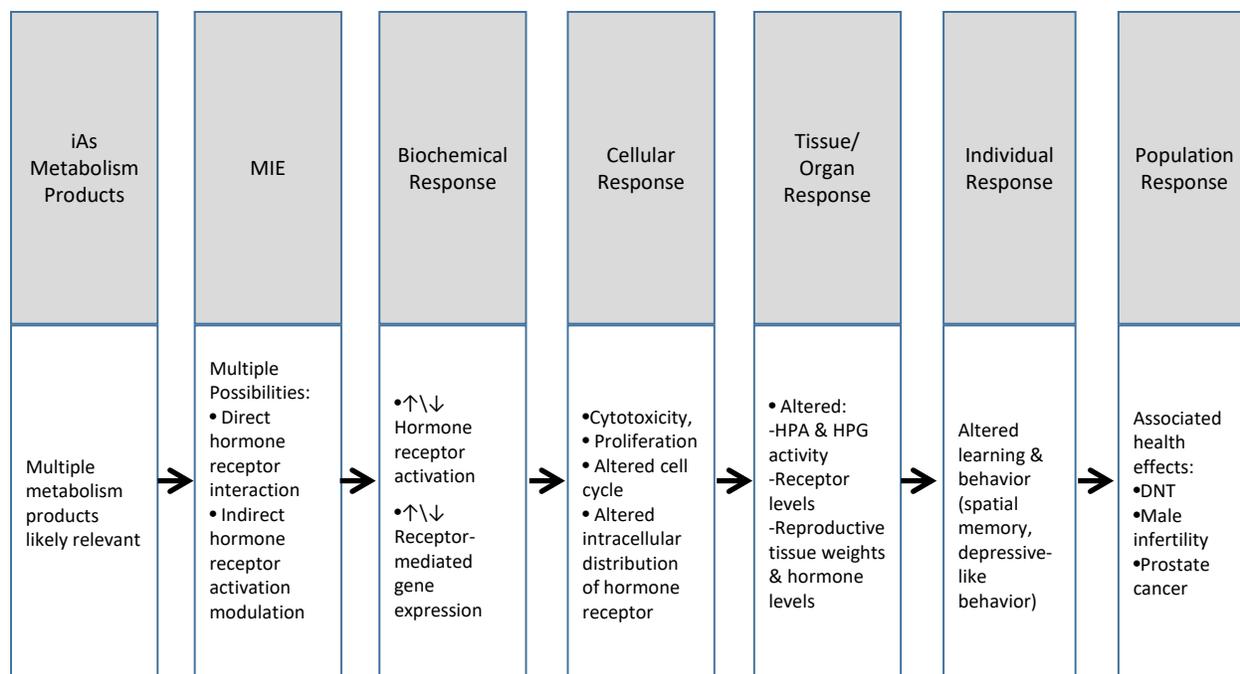
##### ***Relevant Health Effects: Developmental Neurotoxicity, Male Infertility, Prostate Cancer***

34 Several adverse health effects following exposure to inorganic arsenic may result from  
35 events mediated by the endocrine system ([Gosse et al., 2014](#); [Goggin et al., 2012](#); [Davey et al., 2008](#);  
36

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1 [Prins, 2008](#)) (see Figure A-3). The MIE in this MOA is a topic of ongoing research, but based on  
2 literature reviewed for this summary, it may involve an interaction between inorganic arsenic and  
3 an element of the transcription complex for gene activation of nuclear hormone receptors.  
4 Specifically, inorganic arsenic may interact or modulate one of the following elements: (1) the  
5 hormone-binding domain of the hormone receptor, (2) signaling pathways (e.g., mitogen-activated  
6 protein kinases [MAPKs], extracellular signal-regulated kinases [ERK 1/2]) responsible for  
7 post-translational modification of steroid hormone receptor proteins (e.g., coactivator  
8 phosphorylation), or (3) histone-modifying proteins (i.e., acetylases, deacetylases, methylases)  
9 involved in receptor activation ([Barr et al., 2009](#); [Rosenblatt and Burnstein, 2009](#); [Stoica et al.,  
10 2000](#)). Notably, the first MIE option, interaction with the hormone-binding domain, may be specific  
11 to estrogen receptor alpha (ER $\alpha$ ), while the other possibilities may be more broadly applicable  
12 across (1) steroid receptors (e.g., glucocorticoid receptor [GR], progesterone receptor [PR],  
13 androgen receptor [AR], mineralocorticoids [MR]) and (2) the larger class of nuclear hormone  
14 receptors (e.g., thyroid hormone receptor [TR], retinoic acid receptor [RAR]) ([Davey et al., 2008](#);  
15 [Bodwell et al., 2006](#); [Stoica et al., 2000](#)).

16         Across receptor types, the literature indicates that the MIE is followed by a series of  
17 biochemical responses that can be broadly characterized as the alteration of gene activation and  
18 subsequent cell signaling, mediated by nuclear hormone receptors (see Table A-2). In the case of  
19 ER $\alpha$ , inorganic arsenic may alter gene activation by inhibiting binding of the natural ligand,  
20 estradiol (E2), to the receptor ([Stoica et al., 2000](#)). Low levels of inorganic arsenic in vitro (1 nM)  
21 can then activate the receptor at levels approaching that of E2 ([Stoica et al., 2000](#)). Activation of  
22 ER $\alpha$  results in altered expression of genes regulated by the receptor (e.g., vitellogenin, pS2, PR),  
23 which is measurable at the mRNA and protein levels ([Stoica et al., 2000](#)). Importantly, inorganic  
24 arsenic activation of ER $\alpha$  gene transcription is likely mediated by the receptor because treatment  
25 with antiestrogen blocks gene transcription mediated by the receptor ([Stoica et al., 2000](#)).



**Figure A-3. Hypothesized mode of action for effects mediated by endocrine signaling.**

DNT = developmental neurotoxicity; HPA = hypothalamic-pituitary-adrenal; HPG = hypothalamic-pituitary-gonadal. Note: The figure shows a high-level summary of key events from the initial molecular interaction through a possible population-level response. The arrows link each key event (e.g., individual responses lead to population responses) but do not necessarily link each specific example response (e.g., behavioral changes are not linked to male infertility). Note particularly that individual-level evidence for this MOA includes only effects related to developmental neurotoxicity, even though population-level responses indicate effects in other systems (i.e., reproductive effects). As the assessment development process moves forward, additional evidence may provide better understanding of the key events in this MOA and the connections between them.

1 While the above sequence of biochemical responses is supported by one group of  
 2 investigators, others provide evidence that responses at the ER $\alpha$  receptor are similar to those of  
 3 other nuclear hormone receptors (e.g., GR, PR, TR, RAR) ([Davey et al., 2007](#); [Stoica et al., 2000](#)).  
 4 Under this second possible sequence of events, the MIE likely leads to alterations in  
 5 post-translational modifications (e.g., phosphorylation) of coactivator proteins (e.g., TIF2, GRIP1)  
 6 that are critical for transcriptional activity at response elements for each receptor  
 7 (e.g., glucocorticoid receptor response elements [GREs]) ([Barr et al., 2009](#); [Rosenblatt and](#)  
 8 [Burnstein, 2009](#)); these modifications may result in impaired interactions between coactivators  
 9 (e.g., CARM1 and GRIP1) ([Barr et al., 2009](#)). Alternatively, the MIE may lead to alterations in  
 10 histone modifications necessary for receptor-mediated gene activation (e.g., lower acetylation or  
 11 methylation) ([Barr et al., 2009](#)). Ultimately, perturbations in the transcriptional complex impair  
 12 receptor binding to response elements, leading to changes in receptor-mediated gene activation  
 13 ([Barr et al., 2009](#); [Rosenblatt and Burnstein, 2009](#)). Changes in gene activation mediated by  
 14 inorganic arsenic through this MOA may result in either activation or suppression of gene activity.

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1 Where low levels of inorganic arsenic (i.e., nanomolar range) may elevate hormone-mediated gene  
2 activation, higher (i.e., micromolar range), noncytotoxic concentrations may suppress  
3 hormone-mediated gene activation ([Davey et al., 2008](#); [Bodwell et al., 2006](#); [Bodwell et al., 2004](#)).  
4 In addition to different outcomes resulting from low versus higher inorganic arsenic exposure  
5 levels, differences in levels of hormone receptors may underlie different responses across organ  
6 and tissue types ([Bodwell et al., 2006](#)).

7 Changes at the cellular level can ultimately lead to tissue or organ system responses that in  
8 this MOA include alterations in elements of the hypothalamic-pituitary-adrenal (HPA) axis  
9 (e.g., intracellular receptor distribution, protein glycosylation), the hypothalamic-pituitary-gonadal  
10 (HPG) axis (e.g., lower concentrations of gonadotropins and sex steroid hormones), testicular  
11 toxicity, impaired spermatogenesis, toxicity to the female reproductive system, and  
12 hormone-dependent tissue remodeling (i.e., morphogenesis) ([Goggin et al., 2012](#); [Chatterjee and](#)  
13 [Chatterji, 2010](#); [Davey et al., 2008](#); [Jana et al., 2006](#); [Sarkar et al., 2003](#); [Chattopadhyay et al., 1999](#))  
14 (see Table A-2). Data supporting alterations in the HPA axis are available from a developing animal  
15 model, suggesting that early life exposures to inorganic arsenic may have particular effects at the  
16 individual level, as discussed below ([Goggin et al., 2012](#)). Still other studies have suggested  
17 endocrine-mediated effects of inorganic arsenic exposure on male and female reproductive systems  
18 (e.g., decreased reproductive tissue weight, sperm count, infertility, altered activity of ovarian and  
19 testicular enzymes, and prostate cancer), which follows from alterations in elements of the HPG  
20 axis noted above at levels ranging from 53  $\mu\text{mol/L}$  in mice ([Pant et al., 2004](#)) to up to 80  $\mu\text{g/mL}$  in  
21 rats ([Chatterjee and Chatterji, 2010](#); [Prins, 2008](#); [Jana et al., 2006](#); [Sarkar et al., 2003](#);  
22 [Chattopadhyay et al., 1999](#)). Changes in morphogenesis were observed in an amphibian model of  
23 thyroid hormone (TH) activity that also has important implications for inorganic arsenic effects on  
24 TH during the perinatal period of human development (6 months of gestation through early  
25 postnatal development) ([Goggin et al., 2012](#)).

26 Little evidence was identified to link tissue or organ-level responses to individual responses  
27 through this MOA; however, several studies suggest that alterations in GR transcription and  
28 subsequent changes in HPA axis activity, such as those outlined above, can lead to developmental  
29 neurotoxicity (e.g., impaired stress response, depressive-like behaviors) following developmental  
30 inorganic arsenic exposure in mice ([Goggin et al., 2012](#); [Martinez-Finley et al., 2011](#); [Martinez-](#)  
31 [Finley et al., 2009](#); [Martinez et al., 2008](#)) (see Table A-2).

32 No data were identified indicating the types of responses that might occur in susceptible  
33 individuals through this MOA. Given the role of steroid receptors in this MOA, differences in  
34 receptor or steroid levels across life stages or physiologic conditions may confer differences in  
35 response to inorganic arsenic exposures across individuals and provide insight on potentially  
36 susceptible individuals ([Bodwell et al., 2006](#)). The influence of receptor levels is particularly  
37 important in considering developmental inorganic arsenic exposures due to the critical role that  
38 TH, RAR, and other nuclear hormone receptors play during development coupled with evidence of

1 developmental neurotoxicity in animal models of inorganic arsenic exposure ([Goggin et al., 2012](#);  
2 [Martinez-Finley et al., 2011](#); [Martinez-Finley et al., 2009](#); [Davey et al., 2008](#); [Martinez et al., 2008](#)).

3 Thus, pregnant women and developing children may be particularly susceptible to adverse  
4 outcomes from inorganic arsenic exposure.

5 Responses in susceptible individuals clearly influence responses observed at the population  
6 level. To that end, findings in rodents suggesting that endocrine effects may result in  
7 developmental neurotoxicity are concordant with findings in the epidemiology literature that show  
8 a correlation between early life exposure to inorganic arsenic and cognitive function ([Wasserman  
9 et al., 2007](#)). Other literature supports higher incidences of male infertility and prostate cancer in  
10 populations exposed to inorganic arsenic, although the connections between these observations  
11 and effects on the endocrine system are less clear.

#### **A.2.6. Hypothesized Mode of Action (MOA): Cytotoxicity and Regenerative Proliferation**

12 ***Relevant Health Effects: Bladder Cancer, Lung Cancer, Skin Cancer.***

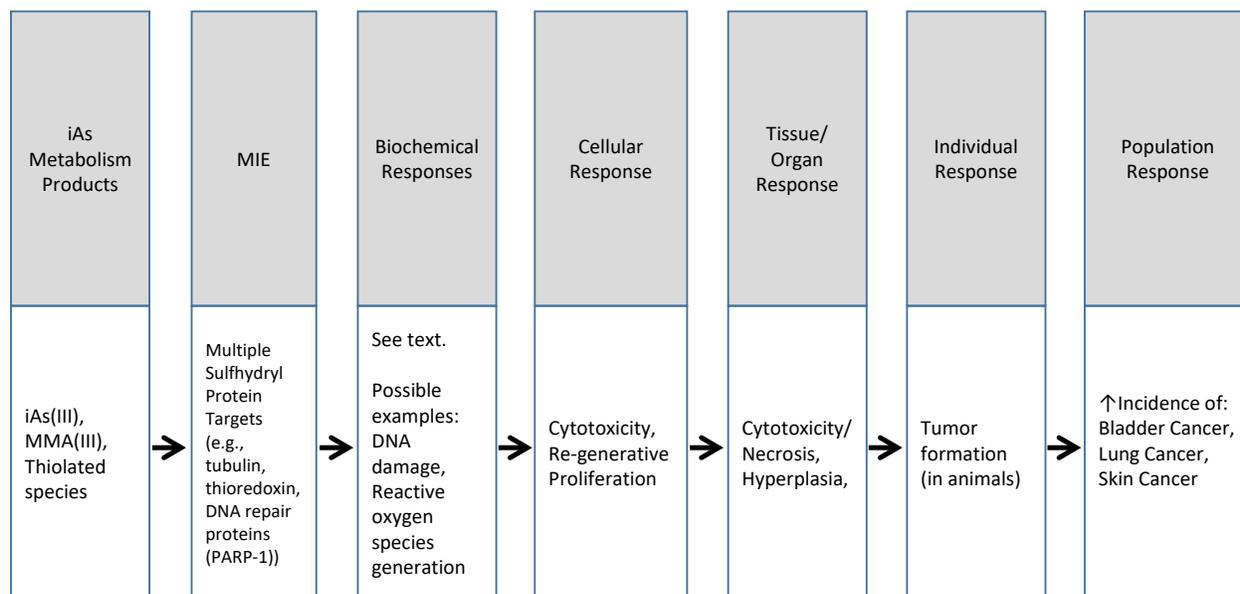
13 [Cohen et al. \(2013\)](#) has proposed that the carcinogenic action of inorganic arsenic in the  
14 bladder is due to a MOA that includes cytotoxicity to urothelial cells followed by regenerative  
15 proliferation leading eventually to urothelial carcinoma. [Cohen et al. \(2013\)](#) have further suggested  
16 that this MOA may also apply to lung and skin cancers. Prior to the molecular initiating events in  
17 this MOA, it is assumed that inorganic arsenic will be transformed into active metabolites. Under  
18 this MOA, exposure of sensitive tissue to the most toxic arsenic species, As(III) and MMA(III), and  
19 possibly, thiolated species, results in the following sequence of events (see Figure A-4):

- 20 • Reaction with sulfhydryl groups of specific proteins in the target tissue,
- 21 • Cytotoxicity caused by the reactive metabolites,
- 22 • Regenerative proliferation (including hyperplasia) in tissues (e.g., urothelium), and
- 23 • Development of tumors ([Cohen et al., 2013](#)).

24 [Cohen et al. \(2013\)](#) and [Gentry et al. \(2014\)](#) proposed that, following ingestion and  
25 metabolism of relatively large amounts of inorganic arsenic (i.e., greater than 100 µg/L), the MIE  
26 under this MOA is the reaction of arsenic species with protein thiol groups in epithelial cells.

27 Several specific protein thiol targets have been identified, mostly by in vitro studies,  
28 including tubulin, keratin, estrogen receptor-α (ERα), thioredoxin reductase, and DNA  
29 repair-associated proteins PARP-1, XPA, and XPD. In vitro studies with synthetic peptides also  
30 indicate that inorganic arsenic species can react specifically with zinc finger motifs in transcription  
31 factors and regulatory proteins ([Wnek et al., 2011](#); [Kitchin and Wallace, 2008](#); [Qin et al., 2008](#);

- 1 [Kitchin and Wallace, 2005](#)). However, the specific protein interactions responsible for the observed  
 2 cytotoxicity and subsequent proliferation have not been identified ([Cohen et al., 2013](#)).



**Figure A-4. Hypothesized mode of action for cytotoxicity and regenerative proliferation.**

MMA(III) = monomethylarsenous acid; PARP-1 = Poly [ADP-ribose] polymerase 1.

Note: This figure shows an overview of key events from the initial molecular interaction of arsenic species with sulfhydryl protein targets through a possible population-level response. As the assessment development process moves forward, additional evidence may provide better understanding of key events in the MOA and the level of evidence available to support connections between key events.

- 3 Biochemical responses reported by [Dodmane et al. \(2013\)](#) include alterations in major  
 4 signaling pathways including NRF2-mediated stress response, interferon, p53, cell cycle regulation  
 5 and lipid peroxidation underlying the progression from MIE to cytotoxicity and subsequent  
 6 proliferation to carcinogenic transformation. These biochemical responses were observed in vitro  
 7 in three human cell types, urothelial (1T1) cells, keratinocytes (HEK001), and bronchial epithelial  
 8 (HBE) cells, corresponding to target organs for iAs-induced cancer. While some studies suggest  
 9 that the molecular or genetic mechanisms in this MOA may include DNA strand breaks, altered  
 10 transcription factor or growth factor activity, and generation of reactive oxygen species (ROS)  
 11 ([Wnek et al., 2011](#); [Wnek et al., 2009](#); [Eblin et al., 2008](#); [Eblin et al., 2006](#); [Simeonova et al., 2002](#);  
 12 [Simeonova et al., 2000](#)), other evidence from a short-term studies suggests that mitigating oxidative  
 13 stress does not prevent regenerative proliferation, implying that ROS is not a necessary step in the  
 14 MOA ([Suzuki et al., 2009](#)). Additional studies were not identified to further support or refute other  
 15 possible biochemical responses; however, [Cohen et al. \(2013\)](#) suggest that understanding  
 16 underlying biochemical mechanisms (e.g., oxidative stress, epigenetic effects on DNA and histones),

1 and the direct interaction of arsenic species with cellular signaling pathways is of limited relevance  
2 because the dose-response relationship for the key cellular responses (cytotoxicity and  
3 proliferation) have been so well established.

4 The first proposed key cellular response that [Cohen et al. \(2013\)](#) identified in this MOA is  
5 epithelial cell cytotoxicity. Evidence of cytotoxicity comes from a wide range of in vitro and in vivo  
6 studies. In vitro, the cytotoxicity of arsenic species (i.e., arsenite, MMA[III], DMA[III], and thiol  
7 derivatives) has been demonstrated in a number of primary and immortalized mammalian cell lines  
8 (see Table A-1) ([Suzuki et al., 2010](#); [Eblin et al., 2008](#); [Bredfeldt et al., 2006](#); [Sens et al., 2004](#);  
9 [Drobna et al., 2003](#); [Cohen, 2002](#); [Styblo et al., 2000](#)). Cytotoxicity, as measured by LC<sub>50</sub> or IC<sub>50</sub>,  
10 varies greatly depending on the arsenic species being evaluated and the cell lines employed.  
11 In vitro acute cytotoxicity is greatest for the trivalent species (LC/IC<sub>50</sub> values in the range of  
12 approximately 1–20 µM for As[III], MMA[III], DMA[III]) and lower for the pentavalent analogs  
13 (LC/IC<sub>50</sub>s on the order of 30–1,500 µM). Acute cytotoxicity of trivalent arsenic appears similar in  
14 primary cell lines and immortalized (URO-TSA) cells. Limited data on the thiol analogs such as  
15 DMMAT(V) suggest that their acute toxicity resembles the trivalent arsenicals (LC<sub>50</sub> = 1.4–5.5 µM in  
16 urothelial and bronchial epithelial cells, respectively).

17 Cytotoxicity and cellular necrosis has also been observed at the organ or tissue level in vivo  
18 in a number of studies where rats and mice were exposed to inorganic arsenic in diet and drinking  
19 water (see table in Section A.3) ([Arnold et al., 2014](#); [Yokohira et al., 2011](#); [Suzuki et al., 2010](#);  
20 [Yokohira et al., 2010](#); [Suzuki et al., 2008](#)). Data suggest that female rats are more sensitive to  
21 cytotoxic effects of inorganic arsenic than are male rats or mice of either sex ([Suzuki et al., 2008](#)).  
22 Exposure via drinking water also appears to elicit greater effects on the bladder compared with  
23 dietary exposure in rats and mice ([Suzuki et al., 2008](#)). Evidence also indicates that cytotoxicity in  
24 As3mt knockout mice was generally similar to that seen in the wild type and occurred at similar  
25 exposure levels as seen with As(III), suggesting that methylation was not necessarily a key step in  
26 acute cytotoxicity and that unmethylated As(III) therefore likely played a role in the observed  
27 cytotoxic effects ([Yokohira et al., 2011, 2010](#)). In vitro studies of different cell lines also support a  
28 lack of correlation between arsenic methylation capacity and cytotoxicity ([Styblo et al., 2000](#)).  
29 Finally, a 14-day study in F344 rats and WT and As3mt knockout C57BL/6 mice found increasing  
30 incidence of elevated cytotoxicity scores in the urothelium over time ([Arnold et al., 2014](#)). In rats,  
31 one animal showed isolated foci of cytotoxicity in the urothelium after only 6 hours of exposure,  
32 while larger numbers of rats (seven of ten) showed elevated cytotoxicity scores by the end of the  
33 experiment (14 days). Cytotoxicity scores were also elevated in both the wild type and As3mt  
34 knockout mice beginning at approximately 3 days of exposure.

35 [Cohen et al. \(2013\)](#) proposed that the next key event in this MOA is increased cellular  
36 (regenerative) proliferation at the organ or tissue level, which was observed in several of the  
37 cytotoxicity studies just discussed (see Table A-1). [Simeonova et al. \(2000\)](#) observed urothelial  
38 hyperplasia and metaplasia in female C57BL/6 mice exposed to 0.01% sodium arsenite in drinking

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1 water for 4 weeks or longer. Hyperplasia was accompanied by a “cobblestone” appearance of the  
2 urothelium but not by necrotic cytotoxicity. [Simeonova et al. \(2000\)](#) subsequently observed  
3 urothelial hyperplasia and occasional squamous metaplasia in mice exposed to 50 and 100 µg/L  
4 As(III) for 8 weeks. [Suzuki et al. \(2008\)](#) reported simple urothelial hyperplasia occurring roughly  
5 in parallel with increased cytotoxicity scores in rats and mice exposed to arsenite in food at  
6 50–400 ppm or drinking water at 100 ppm for up to 10 weeks. Subsequent studies with female  
7 rats confirmed a dose-dependent increase in cytotoxicity and urothelial hyperplasia following  
8 dietary exposures of 50 or 100 ppm for approximately 3–5 weeks ([Suzuki et al., 2010](#); [Suzuki et al.,  
9 2009](#)). [Yokohira et al. \(2010\)](#) also observed both urothelial cytotoxicity and hyperplasia in  
10 C57BL/six mice after as few as 6 days of exposure to 150 ppm arsenite in diet or 4 weeks exposure  
11 to 25 ppm arsenite in drinking water. Simultaneous occurrence of cytotoxicity and hyperplasia was  
12 confirmed by scanning electron microscopy (SEM) observations in one mouse exposed to 150 ppm  
13 in food. The focus on low, noncytotoxic concentrations in in vitro studies and the use of  
14 transformed cell lines for evaluating indicators of proliferation (e.g., reduced doubling time) makes  
15 substantiating the sequential relationship of cytotoxicity and regenerative proliferation in this MOA  
16 difficult ([Bredfeldt et al., 2006](#); [Sens et al., 2004](#)).

17 [Cohen et al. \(2013\)](#) define the apical individual response in this MOA as the development of  
18 tumors subsequent to regenerative proliferation. A methylated metabolite, dimethylarsinic acid  
19 [DMA(V)], has been found to lead to tumor development in rats but not mice ([Arnold et al., 2006](#)),  
20 and the incidence of urothelial hyperplasia was also elevated in exposed animals. In contrast to the  
21 results for DMA(V), inorganic arsenic has generally not been found to be carcinogenic in  
22 conventional rodent bioassays with adult animals. Differences in outcomes between exposures to  
23 inorganic arsenic and DMA(V) may arise from metabolism or distribution of the compound in rats,  
24 and may not be relevant to metabolism or distribution in humans ([Cohen et al., 2013](#)). As discussed  
25 below, higher incidences of tumors in human populations with high exposures to inorganic arsenic  
26 suggest that this MOA is relevant for understanding adverse health outcomes in humans and  
27 emphasize the importance of recent efforts to develop new rodent models of inorganic arsenic  
28 carcinogenicity ([Cohen et al., 2013](#)).

29 In contrast to data in adult animals, inorganic arsenic has been found to cause multisite  
30 tumors in the offspring of rodents after in utero exposures (see Table A-1) ([Tokar et al., 2011](#);  
31 [Waalkes et al., 2004b](#); [Waalkes et al., 2003](#)). Dose-related increases in hyperplasia were also seen  
32 in several tissues, including the bladder, ovaries, and uterus of the females ([Tokar et al., 2011](#)).

33 With regard to population responses, [Cohen et al. \(2013\)](#) also suggested that the available  
34 epidemiological studies support the regenerative proliferative mechanism, in that increased  
35 arsenic-related cancer risk has only clearly been demonstrated in populations with exposure to  
36 relatively high doses of inorganic arsenic (see Table A-1). This would be consistent with a situation  
37 in which increased cancer risk only occurred when internal concentrations of As(III) and/or other

- 1 toxic metabolites reached levels associated with cytotoxicity, followed by regenerative proliferation
- 2 and tumor development.

### A.3. MECHANISTIC AND SUSCEPTIBILITY DATA TABLES

**Table A-1. Data on effects mediated by cytotoxicity and regenerative proliferation – relevant health effects: bladder, lung, and skin cancer**

Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
<b>Molecular initiating events</b>					
Reactions with GSH and other nonprotein thiols	Glutathione, cysteine, lipoic acid conjugates	Many	Humans, rodents, in vitro	Environmentally relevant and higher exposures	<a href="#">Cohen et al. (2013)</a>
Reaction with thiols/dithiols in specific proteins	Inorganic arsenic binding with tubulin, keratin, ER $\alpha$ and related receptors, PARP-1, thioredoxin reductase, AS3MT, KEAP-1, many studies of zinc finger proteins, peptides; I $\kappa$ B kinase; EGFR, Shc; tyrosine phosphatases, ubiquitination enzymes; XPA, XPD (NER enzymes)	Not applicable	In vitro binding of As(III) to synthetic peptides	Kds = ~1–30 $\mu$ g/L ( $\downarrow$ Kd with $\uparrow$ cysteine residues)	<a href="#">Kitchin and Wallace (2008, 2005)</a> ; <a href="#">Qin et al. (2008)</a>
	Reduced PARP activity, restored by coincubation with Zn	Urothelium (human)	UROtsa cells	50 nM MMA(III) (12–52 wk)	<a href="#">Wnek et al. (2011)</a> ; <a href="#">Wnek et al. (2009)</a>
<b>Biochemical responses</b>					
See summary text					<a href="#">Cohen et al. (2013)</a>
<b>Cellular responses</b>					
Cytotoxicity/viability	24-h viability (mitochondrial dehydrogenase assay)	Urothelium (human)	UROtsa, other cell lines	Arsenite IC <sub>50</sub> for UROtsa = 17.8 $\mu$ M, 3.2 $\mu$ M for bronchial cells, 10 $\mu$ M for rat hepatocytes, >20 $\mu$ M for human hepatocytes, keratinocytes (24 h)	<a href="#">Styblo et al. (2000)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
	24-h viability (mitochondrial dehydrogenase assay)	Multiple	Primary human, rat hepatocytes; 13 mammalian cell lines	IC <sub>50</sub> S (24 h): As(III) = 1–100 µM; MMA(III): 0.4–5.5 µM; DMA(III): 0.4–>20 µM; most sensitive cell line: MB4 (human leukemia-derived)	<a href="#">Styblo et al. (2000)</a>
	Cell viability (light microscopy); 95% mortality at low exposure, >99% mortality at two highest exposures	Urothelium (human)	UROtsa cells	1 µM As(III) (30–48 d) 4, 8 µM As(III) (30 d)	<a href="#">Sens et al. (2004)</a>
	Viability (MTT) assay	Urothelium (human)	UROtsa cells	IC <sub>50</sub> ~5 µM MMA(III) (24–72 h) “threshold” for viability and morphology changes: ~2 µM	<a href="#">Bredfeldt et al. (2006)</a>
	Viability ↓ 42% (Trypan blue assay) *reduction, partially abolished by ROS scavengers	Urothelium (human)	UROtsa cells	1 µM As(III) (24 h)	<a href="#">Eblin et al. (2008)</a>
	Viability ↓ (Trypan blue assay) *reduction, partially abolished by NADPH oxidase inhibitor	Urinary bladder epithelium (rat)	MYP3 rat cell line	1 µM As(III) (3 d)	<a href="#">Suzuki et al. (2009)</a>
	Viability ↓ (Trypan blue assay)	Urinary bladder epithelium (rat)	MYP3 rat cell line	LC <sub>50</sub> : 0.75 µM As(III) (3 d)	<a href="#">Suzuki et al. (2010)</a>
		Ureter epithelium (human)	1T1 human cell line	8.3 µM As(III) (3 d)	
Proliferation	Reduced doubling time (43.1 h to 22.1 h)	Urothelium (human)	UROtsa cells	1 µM As(III) (>60 d)	<a href="#">Sens et al. (2004)</a>
	Reduced doubling time (42 h to 27 h)	Urothelium (human)	UROtsa cells	50 nM MMA(III) (12 wk)	<a href="#">Bredfeldt et al. (2006)</a>
	Reduced doubling time (42 h to 21 h)	Urothelium (human)	UROtsa cells	50 nM MMA(III) (52 wk)	<a href="#">Bredfeldt et al. (2006)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
	↑ Thymidine uptake	Urothelium (human)	UROtsa cells	2 or 4 μM sodium arsenite (48–72 h)	<a href="#">Simeonova et al. (2000)</a>
	↑ S-phase cells ↓ G <sub>0</sub> /G <sub>1</sub> cells			2 or 4 μM sodium arsenite (24 h)	
Malignant transformation	Colony formation in soft agar, tumor formation after hetero-transplantation	Urothelium (human)	UROtsa cells	1 μM As(III) (60 d, followed by repeated passages in As-free medium)	<a href="#">Sens et al. (2004)</a>
	Colony formation in soft agar	Urothelium (human)	UROtsa cells	50 nM MMA(III) (24 or 52 wk)	<a href="#">Bredfeldt et al. (2006)</a>
	Differentiation to squamous epithelium with poorly defined cell membranes, multinucleate cells; tumor formation after hetero-transplantation in SCID mice; ↑ proliferative biomarker (Ki-67) in tumors	Urothelium (human)	UROtsa cells	50 nM MMA(III) (52 wk)	<a href="#">Bredfeldt et al. (2006)</a>
<b>Tissue/organ responses</b>					
Tissue cytotoxicity/necrosis	Mild–moderate urothelial cytotoxicity (observed by SEM)	Urothelium (rat; mouse)	F344 rats, C57BL/six mice	100 μg/L As(III) in drinking water (2 wk); or 50–400 μg/g in diet (2–10 wk)	<a href="#">Suzuki et al. (2008)</a>
	Urothelial cytotoxicity, (observed by SEM). Cytotoxicity reduced by NADPH oxidase inhibitor, apocyanin (250 mg/L)	Urothelium (rat)	F344 rats (female)	100 ppm As(III) in diet (20 d)	<a href="#">Suzuki et al. (2009)</a>
	Urothelial cytotoxicity, necrosis (observed by SEM)	Urothelium (rat)	F344 rats (female)	Dose-response ~10–50 ppm As(III) in diet (5 wk) (NOEL: 1–10 ppm; significant at ≤50 ppm)	<a href="#">Suzuki et al. (2010)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
	Urothelial cytotoxicity, necrosis (observed by SEM). Cytotoxicity in KO compared to WT in same treatment groups	Urothelium (mouse)	WT and arsenic methyl-transferase (AS3MT) KO mice (female)	100 ppm As(III) in diet (6 d), followed by 50 ppm in drinking water (3 d)	<a href="#">Yokohira et al. (2010)</a>
	Urothelial cytotoxicity, necrosis (observed by SEM). Cytotoxicity in KO compared to WT in same treatment groups	Urothelium (mouse)	WT and AS3MT KO mice (female)	10–25 ppm As(III) in drinking water (4 wk)	<a href="#">Yokohira et al. (2011)</a>
	Mild–moderate urothelial cytotoxicity (observed by SEM). Severity increased over time	Urothelium (rat)	F344 rats (female)	100 ppm As(III) in drinking water (6 h–14 d)	<a href="#">Arnold et al. (2014)</a>
		Urothelium (mouse)	C57BL/6 WT and AS3MT KO mice (female)	25 ppm As(III) in drinking water (6 h–14 d)	
Tissue regeneration/hyperplasia	Mild–moderate urothelial hyperplasia (male and female rats, male mice)	Urothelium (rat; mouse)	F344 rats; C57BL/six mice	100 µg/L As(III) in water; 50–400 µg/g in diet (2–10 wk)	<a href="#">Suzuki et al. (2008)</a>
	Urothelial hyperplasia. No effect of coexposure to NADPH oxidase inhibitor	Urothelium (rat)	F344 rats (female)	100 ppm As(III) in diet (20 d)	<a href="#">Suzuki et al. (2009)</a>
	Urothelial hyperplasia	Urothelium (rat)	F344 rats (female)	~10–100 ppm As(III) in diet (5 wk) (NOEL: 1–10 ppm; significant at ≤50 ppm)	<a href="#">Suzuki et al. (2010)</a>
	Mild–moderate hyperplasia. Greater severity in KO strain, but NOEL of 1 ppm in both strains.	Urothelium (mouse)	WT and AS3MT KO mice (female)	50 ppm As(III) in drinking water (6 d); or 10–25 ppm As(III) in drinking water (4 wk)	<a href="#">Yokohira et al. (2011)</a>
	Mild–moderate bladder hyperplasia (cancer bioassay)	Urinary bladder (rat)	F344 rats	40 or 100 ppm DMA(V) in feed (2 yr)	<a href="#">Arnold et al. (2006)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
	Urinary bladder hyperplasia. Observed at all exposure levels in males; only observed in lowest exposure group in females	Urinary bladder (mouse)	CD-1 mice	6, 12, 24 ppm sodium arsenite (2 wk prior to parental mating through 2 yr in adulthood)	<a href="#">Tokar et al. (2011)</a>
	Urothelial hyperplasia. Increased severity and incidence over time	Bladder epithelium (rat)	F344 rats (female)	100 ppm As(III) in drinking water (24 h–14 d)	<a href="#">Arnold et al. (2014)</a>
Hyperplasia and Metaplasia	Urothelial hyperplasia, occasional metaplasia	Urinary Bladder (mouse)	C57/BL-6 mice (female)	0.01% sodium arsenite in drinking water (4 wk)	<a href="#">Simeonova et al. (2000)</a>
<b>Individual responses</b>					
Tumor development (animals)	Urothelial cell papillomas. Statistically significant positive trend if male and female data are combined. Urothelial cell carcinomas. Statistically significant positive trend in females if male and female data are combined (low incidence in males precludes statistical analysis).	Urinary bladder (rat)	F344 rats	2–100 ppm DMA(V) in feed (2 yr)	<a href="#">Arnold et al. (2006)</a>
	No increase in tumor incidence	Urinary bladder (mouse)	B6C3F <sub>1</sub> mice	8, 40, 200, or 500 ppm DMA(V) in feed (2 yr)	<a href="#">Arnold et al. (2006)</a>
	Dose-related ↑ in: hepatocellular carcinomas, adrenal tumors (male offspring); lung carcinomas, ovarian tumors, proliferative lesions of oviduct and uterus (female offspring)	Multiple tissues (mouse)	C3H mice	42.5, 85 ppm sodium arsenite in drinking water (gestation Days 8–18)	<a href="#">Waalkes et al. (2004b)</a> ; <a href="#">Waalkes et al. (2003)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
	Increased tumor incidence of liver, lung, gall bladder, adrenal gland kidney (male offspring); liver, lung, ovary, uterus (female offspring)	Multiple tissues (mouse)	CD-1 mice	6, 12, 24 ppm sodium arsenite (2 wk prior parental to mating through 2 yr in adulthood)	<a href="#">Tokar et al. (2011)</a>
<b>Susceptible individuals</b>					
Reduced As methylation capacity	Subjects with lower secondary methylation indices had higher risk of skin and bladder cancer	Skin, urinary bladder (human)	Human population	Cumulative inorganic arsenic intake 0–20 mg/L-yr	<a href="#">Chen et al. (2003b)</a> ; <a href="#">Chen et al. (2003a)</a>
Cytotoxicity, regenerative proliferation associated with urinary calculi	Observations of mild cytotoxicity, regenerative proliferation after exposure to calculi-inducing substances	Urinary bladder (human)	Animals and human population	Drugs (humans) and wax implants (animals)	<a href="#">Cohen (2002)</a>
UV-exposure	↑ UV-induced DNA strand breaks	Skin (human)	HaCaT cells	1 μM sodium arsenite (24 h)	<a href="#">Qin et al. (2008)</a>
	↓ UV-induced DNA repair enzyme activity			2 μM sodium arsenite (24 h)	
<b>Human population responses</b>					
Inorganic arsenic-associated cancer risk (bladder, lung, skin)	Elevated risks of bladder, lung, and skin cancer in chronically inorganic arsenic-exposed populations (multiple epidemiological studies); primarily limited to populations with water As levels >100 μg/L; limited data suggest urinary inorganic arsenic at levels found to be cytotoxic in rodents are associated with elevated risks. Liver, prostate cancer risk associated with inorganic arsenic (smaller number of studies)	Multiple tissues (human)	Humans	Wide range of exposure levels and durations	Reviewed in: <a href="#">Cohen et al. (2013)</a> , <a href="#">Gibb et al. (2011)</a> , <a href="#">Schoen et al. (2004)</a> , <a href="#">NRC (1999)</a>

DMA(V) = dimethylarsinic acid; KO = knockout; NOEL = No-observed-effect level; WT = wild type.

<sup>a</sup>Exposure duration abbreviations: minutes (min), hours (h), days (d), weeks (wk), years (yr).

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**Table A-2. Preliminary data on effects mediated by endocrine disruption – relevant health effects: developmental neurotoxicity, male infertility, prostate cancer**

Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
<b>Molecular initiating events</b>					
Interaction with hormone binding domain in hormone receptors	↑ Reporter activity of ER $\alpha$ hormone binding domain. Inhibited by antiestrogen	Kidney (monkey)	COS-1 cells	1 $\mu$ M sodium arsenite (24 h)	<a href="#">Barr et al. (2009)</a> ; <a href="#">Rosenblatt and Burnstein (2009)</a> ; <a href="#">Stoica et al. (2000)</a>
Modulate signaling pathways (e.g., MAPKs, ERK1/2) responsible for posttranslational modification of coactivators or steroid hormone receptors	Hypothesis	NA	NA	NA	<a href="#">Barr et al. (2009)</a> ; <a href="#">Rosenblatt and Burnstein (2009)</a>
Modulate histone modifying proteins (e.g., acetylases, methylases) responsible for post-translational modification of coactivators or steroid hormone receptors	Hypothesis	NA	NA	NA	<a href="#">Barr et al. (2009)</a> ; <a href="#">Rosenblatt and Burnstein (2009)</a>
<b>Biochemical responses</b>					
<b>Alterations in nuclear hormone receptor-mediated gene activation</b>					
<b>Androgen receptor</b>					
↓ AR amino and carboxyl (N-C) termini interaction	↓ Luciferase activity in mammalian two-hybrid assay	Prostate (human)	PC3 cells (human prostate cancer cells)	5 $\mu$ M ATO (24 h)	<a href="#">Rosenblatt and Burnstein (2009)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
↓ AR coactivator-stimulated N-C interaction	↓ Luciferase activity in mammalian two-hybrid assay	Prostate (human)	PC3 cells (human prostate cancer cells)	5 μM ATO (24 h)	<a href="#">Rosenblatt and Burnstein (2009)</a>
↓ AR coactivator recruitment to chromatin	↓ Immuno-precipitation of TIF2 at PSA promoter	Prostate (human)	LNCaP cells (human prostate cancer cells)	5 μM ATO (24 h)	<a href="#">Rosenblatt and Burnstein (2009)</a>
↓ AR recruitment to chromatin	↓ Chromatin immuno-precipitation of AR at PSA promoter	Prostate (human)	LNCaP cells	5 μM ATO (24 h)	<a href="#">Rosenblatt and Burnstein (2009)</a>
↓ AR-mediated gene activation	↓ Androgen response element luciferase activity (ARE or PSA)	Prostate (human)	PC3, LNCaP, or LAPC4 cells (human prostate cancer cells)	1–5 μM ATO (48 h)	<a href="#">Rosenblatt and Burnstein (2009)</a>
	↓ Androgen response element luciferase activity	Testes (mice)	TM4 mouse Sertoli cells	2 μM ATO (48 h)	<a href="#">Rosenblatt and Burnstein (2009)</a>
	↓ PSA mRNA	Prostate (human)	LNCaP cells	2 μM ATO (48 h)	<a href="#">Rosenblatt and Burnstein (2009)</a>
<b>ER</b>					
Inhibition of estradiol binding to ER $\alpha$	↓ [ <sup>3</sup> H]estradiol binding Not seen in work using ER $\alpha$ competitive screening kit using ER $\alpha$ competitive screening kit	Breast (human)	Human breast cancer MCF-7 cells	Ki: 0.5 nM sodium arsenite (18 h)	<a href="#">Stoica et al. (2000)</a>
	No ↓ [ <sup>3</sup> H]estradiol binding	Breast (human)	Biochemical assay (screening kit)	100–200 nM ATO (not specified)	<a href="#">Chow et al. (2004)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
↑ ERα activation	↑ Estrogen response element reporter construct activity in ERα	Kidney (monkey)	COS-1 cells	1 nm-10 μM sodium arsenite (24 h)	<a href="#">Stoica et al. (2000)</a>
Altered ER-mediated gene activation	↓ Vitellogenin expression (mRNA)	Liver (chicken)	Chick embryo	10–50 μmol/kg As(III) (4 h) 10 μmol/kg E2 (3 h)	<a href="#">Davey et al. (2007)</a>
	↓ Estrogen response element expression (luciferase expression or mRNA)	Breast (human)	Human breast cancer MCF-7 cells	2.5 μM As(III) (EC <sub>50</sub> ) (24 h)	<a href="#">Davey et al. (2007)</a>
	↓ GREB1 basal (mRNA)	Breast (human)	Human breast cancer MCF-7 cells	5 μM As(III) (EC <sub>50</sub> ) (24 h)	<a href="#">Davey et al. (2007)</a>
	↓ GREB1-E2 induced (mRNA)	Breast (human)	Human breast cancer MCF-7 cells	5 μM As(III) (EC <sub>50</sub> ) (24 h)	<a href="#">Davey et al. (2007)</a>
	↓ ERα basal (mRNA)	Breast (human)	Human breast cancer MCF-7 cells	5 μM As(III) (EC <sub>50</sub> ) (24 h)	<a href="#">Davey et al. (2007)</a> ; <a href="#">Stoica et al. (2000)</a>
	↓ ERα basal (mRNA)	Breast (human)	Human breast cancer MCF-7 cells	2 μM ATO (24 or 48 h)	<a href="#">Chow et al. (2004)</a>
	↓ ERα hormone induced (mRNA). Synergistic ↓ with E2	Breast (human)	Human breast cancer MCF-7 cells	2 μM ATO + 10 nM estradiol (24 or 48 h)	<a href="#">Chow et al. (2004)</a>
	↓ Estrogen response element expression (luciferase expression)	Breast (human)	Human breast cancer MCF-7 cells	2 μM ATO (24 or 48 h) 2 μM ATO + 10 nM estradiol (24 or 48 h)	<a href="#">Chow et al. (2004)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
	↓ c-myc protein	Breast (human)	Human breast cancer MCF-7 cells	2 μM ATO (48 h)	<a href="#">Chow et al. (2004)</a>
	↓ c-myc protein induced by E2			2 μM ATO + 10 nM estradiol (48 h)	
	↑ pS2 (mRNA) ↑ Blocked by antiestrogen	Breast (human)	Human breast cancer MCF-7 cells	1 μM sodium arsenite (24 h)	<a href="#">Stoica et al. (2000)</a>
↓ ER-mediated protein levels	↓ ERα protein	Breast (human)	Human breast cancer MCF-7 cells	0.1, 1, or 5 μM sodium arsenite (24 h)	<a href="#">Stoica et al. (2000)</a>
	↓ ERα protein	Breast (human)	Human breast cancer MCF-7 cells	2 μM ATO (48 h)	<a href="#">Chow et al. (2004)</a>
	↓ ERα hormone induced protein. Synergistic ↓ with E2	Breast (human)	Human breast cancer MCF-7 cells	2 μM ATO + 10 nM 17β-estradiol (48 h)	
	↑ Progesterone receptor protein ↑ Blocked by antiestrogen	Breast (human)	Human breast cancer MCF-7 cells	1 μM sodium arsenite (24 h)	
	↓ Vascular endothelial growth factor protein (mRNA and protein)	Uterus (rat)	Sprague-Dawley rats (female)	4 μg/ml sodium arsenite (28 d)	<a href="#">Chatterjee and Chatterji (2010)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
<b>Glucocorticoid receptor (GR)</b>					
Altered histone posttranslational coactivator protein activity at GR-regulated promoter	↓ Protein methyltransferase (CARM1)/coactivator (GRIP1) interaction	Tumor (mouse)	1470.2 cells (mouse adenocarcinoma derived)	8 μM sodium arsenite + 5 nM dexamethasone (Dex) (30 min)	<a href="#">Barr et al. (2009)</a>
Altered histone posttranslational modifications at GR-regulated promoter	↓ Acetylation (H3K18ac) ↓ methylation (H3R17me)	Tumor (mouse)	1470.2 cells (mouse adenocarcinoma derived)	8 μM sodium arsenite + 5 nM Dex (15 min)	<a href="#">Barr et al. (2009)</a>
↓ Chromatin remodeling at GR regulated promoter	↓ A Sac1 endonuclease cleavage site access	Tumor (mouse)	1470.2 cells (mouse adenocarcinoma derived)	8 μM sodium arsenite + 5 nM Dex (30 and 60 min)	<a href="#">Barr et al. (2009)</a>
↓ GR binding to glucocorticoid response elements (GREs)	↓ GR binding to GREs in H-Ras and Raf-1 promoters (chromatin immunoprecipitation). No ↓ binding in vitro	Developing brain (mouse)	C57BL/six mice	50 ppb sodium arsenite (2 wk prior to gestation + through weaning)	<a href="#">Martinez-Finley et al. (2011)</a>
↓ Transcription initiation at GR-regulated promoter	↓ Reporter gene mRNA initiation	Tumor (mouse)	1470.2 cells (mouse adenocarcinoma derived)	8 μM sodium arsenite + 5 nM Dex (120 min)	<a href="#">Barr et al. (2009)</a>
	↓ Endogenous GR-regulated mRNA (serum glucocorticoid kinase [SGK]) initiation	Tumor (mouse)	1470.2 cells (mouse adenocarcinoma derived)	8 μM sodium arsenite + 5 nM Dex (120 min)	<a href="#">Barr et al. (2009)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
↑/↓ GR mediated gene transcription	↓ Reporter gene activity (MMTV-chloramphenicol acetyl transferase [MMTV-CAT])	Tumor (mouse)	1470.2 cells (mouse adenocarcinoma derived)	0.5–8 μM sodium arsenite + 100 nM Dex (4 h)	<a href="#">Barr et al. (2009)</a>
	↑ Reporter gene activity (G2T-luciferase construct)	Liver (rat)	EDR3 cells (hepatoma cell line)	<1 μM sodium arsenite + 50 nM Dex (18 h)	
	↓ Reporter gene activity (G2T-luciferase construct)	Liver (rat)	EDR3 cells (hepatoma cell line)	≤1–3 μM sodium arsenite + 50 nM Dex (18 h)	
<b>MR</b>					
↑/↓ MR-mediated gene transcription	↑ Reporter gene activity (G2T-luciferase construct)	Liver (rat)	EDR3 cells (hepatoma cell line)	<1 μM sodium arsenite + 0.5 nM aldosterone (18 h)	<a href="#">Bodwell et al. (2006)</a>
	↓ Reporter gene activity (G2T-luciferase construct)	Liver (rat)	EDR3 cells (hepatoma cell line)	≤1–3 μM sodium arsenite + 0.5 nM aldosterone (18 h)	
<b>PR</b>					
↑/↓ PR-mediated gene transcription	↑ Reporter gene activity (G2T-luciferase construct)	Liver (rat)	EDR3 cells (hepatoma cell line)	<1 μM sodium arsenite + 50 nM progesterone (18 h)	<a href="#">Bodwell et al. (2006)</a>
	↓ Reporter gene activity (G2T-luciferase construct)	Liver (rat)	EDR3 cells (hepatoma cell line)	≤1–3 μM sodium arsenite + 50 nM progesterone (18 h)	
<b>TR</b>					
Altered TR gene induction	↓ TR response element-luciferase (TRE-luc)	Pituitary (rat)	GH3 rat pituitary tumor cells	0.5–2 μM As(III) + 2 nM thyroid hormone (T3) (24 h)	<a href="#">Davey et al. (2008)</a>
	↑ DIO1	Pituitary (rat)	GH3 rat pituitary	0.1–1 μM As(III) + 2 nM T3 (6 h)	

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Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
	↓ DIO1		tumor cells	2 μM As(III) + 2 nM T3 (6 h)	
	↑ DIO1			1–2 μM As(III) + 2 nM T3 (24 h)	
<b>RAR</b>					
Altered RAR-mediated gene activation	↑ Retinoic acid inducible RARE-luciferase expression induced by ATRA	Embryo (human)	NTERA-2 (N2) human embryonic carcinoma cells	0.05–0.025 μM As(III) (24 h)	<a href="#">Davey et al. (2008)</a>
	↓ RARE-luciferase expression induced by ATRA	Embryo (human)	N2 cells	2.0 μM As(III) (24 h)	<a href="#">Davey et al. (2008)</a>
	↑ CYP26A induced by ATRA	Embryo (human)	N2 cells	0.01 μM As(III) (24 h)	<a href="#">Davey et al. (2008)</a>
	↓ CYP26A induced by ATRA	Embryo (human)	N2 cells	≤0.025 μM As(III) (24 h)	
<b>Alterations in cell signaling pathways mediated by hormone receptors</b>					
MAPK pathway alterations	↓ H-Ras and Raf-1 mRNA. No ↓ in protein	Developing brain (mouse)	C57BL/6 mice (PND 35)	50 ppb sodium arsenite (2 wk prior to gestation + through weaning on PND 23)	<a href="#">Martinez-Finley et al. (2011)</a>
	↓ Phosphorylated-ERK	Developing brain (hypothalamus; Mouse)	C57BL/six mice (PND 35)	50 ppb sodium arsenite (2 wk prior to gestation + through weaning on PND 23)	<a href="#">Martinez-Finley et al. (2011)</a>
<b>Cellular responses</b>					
Cytotoxicity	↓ Colony forming ability	Breast (human)	Human breast cancer MCF-7 cells	15 μM As(III) (LC <sub>50</sub> ) (24 h); or 25 μM As(III) (LC <sub>50</sub> ) + 50 pM E2 (24 h)	<a href="#">Davey et al. (2007)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
			Human breast cancer MCF-7 cells	2 µM ATO + 10 nM 17β-estradiol (IC <sub>50</sub> ) (72 h) Reduced viability as compared to E2 alone	<a href="#">Chow et al. (2004)</a>
			Human breast cancer MCF-7 cells	8 µM ATO (IC <sub>50</sub> ) (24 h) 1–2 µM ATO (IC <sub>50</sub> ) (72 h)	<a href="#">Chow et al. (2004)</a>
			Human breast cancer MDA-MB-231 cells	17 µM ATO (IC <sub>50</sub> ) (24 h) 4–8 µM ATO (IC <sub>50</sub> ) (72 h)	<a href="#">Chow et al. (2004)</a>
		Embryo	NTERA-2 (N2) human embryonic carcinoma cells	3 µM As(III) (LC <sub>50</sub> ) (24 h)	<a href="#">Davey et al. (2008)</a>
		Pituitary (rat)	GH3 rat pituitary tumor cells	5–10 µM As(III) (LC <sub>50</sub> ) (24 h)	<a href="#">Davey et al. (2008)</a>
Proliferation	↑ Colony forming ability	Pituitary (rat)	GH3 rat pituitary tumor cells	0.01–1 µM As(III) + 10 nM thyroid hormone (T3) (24 h)	<a href="#">Davey et al. (2008)</a>
	↑ Cell number. Growth inhibited by antiestrogen	Breast (human)	Human breast cancer MCF-7 cells	1 µM sodium arsenite (5–8 d)	<a href="#">Stoica et al. (2000)</a>
	↓ Cell number	Prostate (human)	LNCaP, or LAPCaP-R1 cells (human prostate cancer cells)	5 µM ATO (3 and 5 d)	<a href="#">Rosenblatt and Burnstein (2009)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
Altered cell cycle	21% ↓ G1 phase cells 8% ↓ S phase cells 12% ↓ G2/M phase cells	Breast (human)	Human breast cancer MCF-7 cells	2 μM ATO (48 h; greater effect at 72 h)	<a href="#">Schulze et al. (2004)</a> <a href="#">Kim et al. (2010)</a> <a href="#">Rao and Avani (2004)</a> <a href="#">Cao et al. (2011)</a> <a href="#">Cui et al. (2006b)</a> <a href="#">Chow et al. (2004)</a>
	26% ↑ G1 phase cells 8% ↓ S phase cells 10% ↓ G2/M phase cells	Breast (human)	Human breast cancer MCF-7 cells	2 μM ATO + 10 nM 17β-estradiol (48 h) Reduced viability	<a href="#">Chow et al. (2004)</a>
	↓ G1 cell cycle proteins (cyclin D1 and CDK4) mRNA	Uterus (rat)	Sprague-Dawley rats (female)	4 μg/ml sodium arsenite (28 d)	<a href="#">Chatterjee and Chatterji (2010)</a>
Altered hormone receptor distribution	No change in cytosolic MR protein ↓ nuclear MR protein	Developing brain (hippocampus; mouse)	C57BL/six mice (PND 35–40)	55 ppb sodium arsenate (2 wk prior to gestation through PND 23)	<a href="#">Martinez-Finley et al. (2009)</a>
	↓ Cytosolic GR protein ↓ nuclear GR protein	Developing brain (hippocampus; mouse)	C57BL/six mice (PND 35–40)	55 ppb sodium arsenate (2 wk prior to gestation through PND 23)	<a href="#">Martinez-Finley et al. (2009)</a>
	↓ Cytosolic GR protein ↑ nuclear GR protein	Developing brain (hypothalamus; mouse)	C57BL/six mice (PND 31–40)	50 ppb sodium arsenate (2 wk prior to gestation through weaning on PND 21)	<a href="#">Goggin et al. (2012)</a>
<b>Tissue or organ system responses</b>					
Altered HPA axis activity	↑ Corticotrophin releasing factor	Developing brain (hypothalamus; mouse)	C57BL/six mice (PND 31–40)	50 ppb sodium arsenate (2 wk prior to gestation through weaning on PND 21)	<a href="#">Goggin et al. (2012)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration) <sup>a</sup>	References
	↑ Base-line CORT	Plasma (mouse)	C57BL/six mice (PND 35)	50 ppb sodium arsenate (2 wk prior to gestation through weaning on PND 21 or 23)	<a href="#">Goggin et al. (2012)</a>
			C57BL/six mice (PND 75–90)		<a href="#">Martinez et al. (2008)</a>
	↑ Plasma corticosterone	Plasma (rat)	Albino rats (male)	5 mg/kg-d sodium arsenite (6 d/wk for 4 wk)	<a href="#">Jana et al. (2006)</a>
Altered HPG axis activity	Dose dependent ↓ in: plasma hormone levels (LH, FSH, testosterone)	Plasma (rat)	Wistar rats (male)	5 or 6 mg/kg-d sodium arsenite (26 d)	<a href="#">Sarkar et al. (2003)</a>
	↓ In plasma LH, FSH, testosterone	Plasma (rat)	Albino rats (male)	5 mg/kg-d sodium arsenite (6 d/wk for 4 wk)	<a href="#">Jana et al. (2006)</a>
	↓ Serum estradiol levels	Serum (rat)	Sprague-Dawley rats (female)	0.4, 4, 40 or 80 µg/ml sodium arsenite (14–56 d)	<a href="#">Chatterjee and Chatterji (2010)</a>
	↓ Serum LH, FSH levels	Serum (rat)	Sprague-Dawley rats (female)	4 µg/ml sodium arsenite (28 d)	<a href="#">Chatterjee and Chatterji (2010)</a>
	↓ Plasma estradiol, LH, FSH levels. No effects detected at 16 d of exposure	Plasma (rat)	Sprague-Dawley rats (female)	0.4 ppm sodium arsenite (16 or 28 d)	<a href="#">Chattopadhyay et al. (1999)</a>

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Testicular toxicity	↓ In paired testicular weights; and testicular testosterone; altered testicular enzyme levels; germ cell degeneration at stage VII. Effects alleviated by coadministration of human chorionic gonadotrophin. Effects enhanced by coadministration of estradiol	Male reproductive organs (rat)	Albino rats (male)	5 mg/kg-d sodium arsenite (6 d/wk for 4 wk)	<a href="#">Jana et al. (2006)</a>
	↓ Testicular weights, sperm count and motility, altered testicular enzyme activities	Male reproductive organs (mouse)	Swiss albino mice (male)	53.39 µmol/L sodium arsenite (365 d)	<a href="#">Pant et al. (2004)</a>
Impaired spermatogenesis	Dose dependent ↓ in: reproductive organ weight; epididymal sperm count; and degeneration of germ cells at Stage VII	Male reproductive organs (rat)	Wistar rats (male)	5 or 6 mg/kg-d sodium arsenite (26 d)	<a href="#">Sarkar et al. (2003)</a>
Female reproductive toxicity	↓ Uterine weight; altered uterine morphology	Female reproductive organs (rat)	Sprague-Dawley rats (female)	4 µg/ml sodium arsenite (28 d)	<a href="#">Chatterjee and Chatterji (2010)</a>
	↓ Uterine, ovary, and vagina weights, ovarian enzymes. No effects detected at 16 d of exposure	Female reproductive organs (rat)	Sprague-Dawley rats (female)	0.4 ppm sodium arsenite (16 or 28 d)	<a href="#">Chattopadhyay et al. (1999)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
Altered protein glycosylation	↓ Fully glycosylated 11β-hydroxysteroid dehydrogenase Type 1	Developing brain (hippocampus; mouse)	C57BL/six mice (PND 75–90)	50 ppb sodium arsenate (2 wk prior to gestation through weaning on PND 21)	<a href="#">Goggin et al. (2012)</a>
Altered receptor levels	↑ (Trend) GR mRNA	Adolescent brain (hippocampus; mouse)	C57BL/six mice (PND 31–40)	50 ppb sodium arsenate (2 wk prior to gestation through weaning on PND 21)	<a href="#">Goggin et al. (2012)</a>
	↓ Corticotrophin-releasing factor receptor	Adult brain (hippocampus; mouse)	C57BL/six mice (PND 75–90)	50 ppb sodium arsenate (2 wk prior to gestation through PND 23)	<a href="#">Martinez et al. (2008)</a>
	↓ Estrogen receptor mRNA and protein	Uterus (rat)	Sprague-Dawley rats (female)	4 µg/ml sodium arsenite (28 d)	<a href="#">Chatterjee and Chatterji (2010)</a>
Altered receptor sensitivity	↑ Specific binding to serotonin receptor (5HT-1A)	Adult brain (hippocampus; mouse)	C57BL/six mice (PND 75–90)	50 ppb sodium arsenate (2 wk prior to gestation through PND 23)	<a href="#">Martinez et al. (2008)</a>
Altered neurotransmitter levels	↑ Dopamine ↓ Noradrenaline ↓ 5-HT	Adult brain (hypothalamus, pituitary; rat)	Albino rats (male)	5 mg/kg-d sodium arsenite (6 d/wk for 4 wk)	<a href="#">Jana et al. (2006)</a>
Impaired morphogenesis	↓ T3-dependent tail fin resorption	Tail (African clawed frog)	Ex vivo (African clawed frog tails)	0.05–4 µM As(III) + 10 nM T3 (4 d)	<a href="#">Davey et al. (2008)</a>
<b>Individual response</b>					
Impaired spatial learning and memory	Novel Object Test ↑ time to recognize presence of novel object ↓ entries in presence of novel object	Mouse	C57BL/six mice (PND 35–40)	55 ppb sodium arsenate (2 wk prior to gestation through PND 23)	<a href="#">Martinez-Finley et al. (2009)</a>
	8-way Radial Arm Maze ↑ entry errors				

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
Altered stress response	↑ Baseline CORT. Blunted CORT increase following stressor	Plasma (mouse)	C57BL/six mice (PND 35)	50 ppb sodium arsenate (2 wk prior to gestation through weaning on PND 21)	<a href="#">Goggin et al. (2012)</a>
Depressive-like behavior	Learned Helplessness Task ↑ latency to escape in	Mouse	C57BL/six mice (PND 75–90)	50 ppb sodium arsenate (2 wk prior to gestation through PND 23)	<a href="#">Martinez et al. (2008)</a>
	Forced Swim Test ↑ immobility	Mouse	C57BL/six mice (PND 75–90)	50 ppb sodium arsenate (2 wk prior to gestation through PND 23)	<a href="#">Martinez et al. (2008)</a>
<b>Susceptible individuals</b>					
Developing children	Indicators of developmental neurotoxicity in rodents coupled with lower cognitive performance in epidemiology studies	See rows above and below for animal and epidemiological data, respectively	Rats or human population	Varies	<a href="#">Goggin et al. (2012)</a> ; <a href="#">Martinez-Finley et al. (2009)</a> ; <a href="#">Martinez et al. (2008)</a> ; <a href="#">Wasserman et al. (2007)</a>
<b>Population-level response</b>					
Developmental neurotoxicity	↓ Performance on Wechsler Preschool and Primary Scale of Intelligence	Brain (human)	6-yr-old children (Araihazar, Bangladesh)	Mean 120.1 µg/L in urine (not specified)	<a href="#">Wasserman et al. (2007)</a>
Male infertility	Abnormal sperm, ↓ sperm count, sperm mobility	(Human and animal model)	Human and animal models	Varies	<a href="#">Rosenblatt and Burnstein (2009)</a>
	↑ Male infertility	Reproductive system (human)	Human population	Varies	<a href="#">Shen et al. (2013)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
Prostate cancer	↑ Prostate cancer mortality associated with inorganic arsenic exposures	Prostate (human)	Human population	Varies	Reviewed in <a href="#">Prins (2008)</a>

ATO = arsenic trioxide; ATRA = all trans-retinoic acid; ER = estrogen receptor; FSH = follicle-stimulating hormone; LH = luteinizing hormone; NA = not applicable; PND = postnatal day; PSA = prostate-specific antigen; RARE = RAR response element.

<sup>a</sup>Exposure duration abbreviations: minutes (min), hours (h), days (d), weeks (wk), years (yr).

**Table A-3. Preliminary data on effects mediated by epigenetic mechanisms – relevant health effects: bladder cancer, skin cancer, skin lesions**

Key events	Observations	Observation organ system	Test system observed in	Dose (exposure duration) <sup>a</sup>	References
<b>Molecular initiating events</b>					
↓ SAM	SAM depletion associated with methylation, reduction of inorganic arsenic species	Multiple	Multiple	Multiple	Reviewed in <a href="#">Reichard and Puga (2010)</a> , <a href="#">Martínez et al. (2011)</a> , <a href="#">Ren et al. (2011)</a>
↓ SAM unrelated to inorganic arsenic methylation	↓ SAM in cells with low capacity to methylate inorganic arsenic; ↑ expression of trans-sulfuration enzymes in GSH synthesis	Prostate (human)	Transformed prostate epithelial cell line (RPWE-1)	5 μM arsenite (16 wk)	<a href="#">Coppin et al. (2008)</a> Reviewed in <a href="#">Reichard and Puga (2010)</a>
↑ Oxidative stress and subsequent GSH depletion	↑ ROS; ↑ oxidation of GSH	Multiple	Multiple	Multiple	Reviewed in <a href="#">Reichard and Puga (2010)</a>
	Transformation of HELF cells via ↑ ROS →ERK/NF-κB activation →hsa-miR-21 upregulation	Embryonic lung (human)	HELF	1 μM sodium arsenite (up to 30 cell passages)	<a href="#">Ling et al. (2012)</a>
<b>Biochemical responses</b>					
DNMTs activity	↓ DNMT activity (no change in DNMT mRNA expression), associated with hypomethylation	Prostate (human)	Human prostate epithelial cells (RWPE-1)	5 μM As(III) (29 wk)	<a href="#">Benbrahim-Tallaa et al. (2005)</a>
	SAM depletion, ↓ expression of DNMT1 and DNMT3, global hypomethylation	Skin (human)	Human HaCaT keratinocytes	up to 5 μM As(III) (3 d)	<a href="#">Reichard et al. (2007)</a>
Global DNA methylation changes	Hypermethylation only in folate adequate individuals	Blood (human)	PBL DNA	2–250 μg/L As(III) (>4 yr)	<a href="#">Pilsner et al. (2007)</a>

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Key events	Observations	Observation organ system	Test system observed in	Dose (exposure duration) <sup>a</sup>	References
	Hypermethylation	Blood (human)	PBL DNA	250–500 µg/L As(III) (>6 mo, mean = 10 yr)	<a href="#">Majumdar et al. (2010)</a>
	Hypomethylation	Skin/blood (human)	PBL DNA in individuals with skin lesions	2–250 µg/L (As[III]) (>2 yr)	<a href="#">Pilsner et al. (2009)</a>
	Hypomethylation, increased GSH and decreased SAM levels	Prostate (human)	Human prostate epithelial cells (RWPE-1)	5 µM As(III) (16 wk)	<a href="#">Coppin et al. (2008)</a>
	Hypomethylation, decreased DNMT activity with no change in DNMT mRNA expression	Prostate (human)	Human prostate epithelial cells (RWPE-1)	5 µM As(III) (29 wk)	<a href="#">Benbrahim-Tallaa et al. (2005)</a>
	Hypomethylation	Skin (human)	HaCaT keratinocytes	0.2 µM (4 wk)	<a href="#">Reichard et al. (2007)</a>
	Hypomethylation	Liver (rat)	Rat liver epithelial cells (TRL 1215)	125–500 nM As(III) (18 wk)	<a href="#">Zhao et al. (1997)</a>
	hypomethylation (after 1 d) and chromosomal instability (8 wk)	Lung (Hamster)	Chinese hamster cells (V79-C13)	10 µM As(III) (1 d–8 wk)	<a href="#">Sciandrello et al. (2004)</a>
	Hypomethylation, increased expression of ERα and cyclin CD1 mRNA and protein	Liver (mouse)	129/SvJ mice	45 ppm As(III) (48 wk)	<a href="#">Chen et al. (2004)</a>
	Hypomethylation, gene expression changes	Liver (mouse)	Homozygous Tg.AC mice	150 ppm As(III); 200 ppm As(V); 1,500 ppm MMA(V); or 1,200 ppm DMA(V) (17 wk)	<a href="#">Xie et al. (2004)</a>
	Hypomethylation; correlation with c-myc gene expression, tumor formation in nude mice	Liver (rat)	Rat liver epithelial cells (TRL 1215)	125–500 nM As(III) (18 wk)	<a href="#">Chen et al. (2001)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Observation organ system</b>	<b>Test system observed in</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
	Hypo- and hypermethylation	Kidney and lung (human)	Kidney (UOK) and lung epithelial Type II (A549) cell lines	As(III) (various)	<a href="#">Zhong and Mass (2001)</a>
	Altered methylation patterns in repetitive DNA elements (high in <i>Alu</i> and low in LINE-1 with higher inorganic arsenic exposure)	Blood (human)	Elderly men; blood leukocyte DNA methylation	0.02–1.45 µg/g toenail arsenic (unspecified) <sup>b</sup>	<a href="#">Lambrou et al. (2012)</a>
	↑ Global methylation	Brain cortex and hippocampus (rat)	Wistar rats	3 ppm sodium arsenite; or 36 ppm sodium arsenite (10 d prior to gestation through 1 mo postnatal development)	<a href="#">Martínez et al. (2011)</a>
	Hypomethylation	Brain cortex (rat)	Wistar rats	3 ppm sodium arsenite; or 36 ppm sodium arsenite (10 d prior to gestation through 3 or 4 mo postnatal development)	<a href="#">Martínez et al. (2011)</a>
Gene-specific methylation changes	182 hypermethylated genes (17 = tumor suppressor); 1 hypomethylated gene	Skin and blood (human)	PBL DNA (Zimapan, Mexico)	110 µg As/L (mean) (>2 yr)	<a href="#">Smeester et al. (2011)</a>
	Aberrant DNA methylation; cellular transformation	Bladder (human)	Human bladder cell line (UROtsa)	50 nM MMA(III) (12, 24 wk)	<a href="#">Wnek et al. (2010)</a>
	Altered DNA methylation of 455 promoters (primarily hypomethylation), associated with urinary iAs	Urine and blood (human)	Human urine (16 females in Zimapan, Hidalgo, Mexico)	3.6–31.8 ng total As/mL in urine (10.7 ng/mL [mean]) (unspecified)	<a href="#">Bailey et al. (2013)</a>

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Key events	Observations	Observation organ system	Test system observed in	Dose (exposure duration) <sup>a</sup>	References
	DAPK promoter hypermethylation	Bladder (human)	Human bladder, kidney, ureter tumors from urothelial carcinoma patients (Southwest Taiwan)	Unspecified high doses from well water (unspecified)	<a href="#">Chen et al. (2007)</a>
	p53, p16 promoter hypermethylation (dose-dependent)	Blood (human) associated with skin lesions	Human PBL (West Bengal, India)	>50 µg/L As in drinking water (≤6 mo)	<a href="#">Chanda et al. (2006)</a>
	Hypomethylation in highest exposure group			Highest group: 300–1,000 As µg/L in drinking water (≤6 mo)	
	p16 promoter hypermethylation	Blood (human)	Human PBL in patients with arseniasis (Guizhou Province, China)	Unspecified doses from use of unventilated coal stove with high As (unspecified)	<a href="#">Zhang et al. (2007)</a>
	RASSF1A, PRSS3 promoter hypermethylation	Bladder (human)	Human bladder tumors (New Hampshire, U.S.)	>0.26 µg/g toenail As (unspecified)	<a href="#">Marsit et al. (2006b)</a>
	DBC1, FAM83A, ZSCAN12, C1QTNF6 promoter hypermethylation	Bladder (human)	UROtsa urothelial cells	1 µM As(III), or 50 nM MMA(III) (52 wk)	<a href="#">Jensen et al. (2008)</a>
	WNT5A promoter hypermethylation	Bladder (human)	UROtsa urothelial cells	1 µM As(III), or 50 nM MMA(III) (52 wk)	<a href="#">Jensen et al. (2009b)</a>
	DAPK promoter hypermethylation and reduced expression	Bladder (human)	Uroepithelial cells (SV-HUC-1)	2, 4, or 10 µM As(III) (2 d)	<a href="#">Chai et al. (2007)</a>
	p16 promoter hypermethylation	Immune system (human)	Myeloma cells (U266)	1 or 2 µM As <sub>2</sub> O <sub>3</sub> (3 d)	<a href="#">Fu and Shen (2005)</a>
	p53 promoter hypermethylation	Lung (human)	Lung adenocarcinoma cells (A549)	0.8–2 µM As(III), or 30–300 µM As(V) (1 wk)	<a href="#">Mass and Wang (1997)</a>

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Key events	Observations	Observation organ system	Test system observed in	Dose (exposure duration) <sup>a</sup>	References
	c-myc, c-Hras promoter hypomethylation	Embryo (hamster)	Syrian hamster embryo cells	3–10 $\mu$ M As(III), or 50–150 $\mu$ M As(V) (2 d)	<a href="#">Takahashi et al. (2002)</a>
	p16, RASSF1 promoter hypermethylation, $\downarrow$ expression of p16 and RASSF1, increased occurrence of lung adenocarcinoma	Lung (mouse)	A/J mice	1, 10, or 100 ppm As(V) (18 mo)	<a href="#">Cui et al. (2006a)</a>
	p16, RASSF1A, E-cadherin, GSTP1 promoter hypomethylation	Liver (human)	HepG2 and Huh-7 liver cells	2–10 $\mu$ M As(III) (3 d)	<a href="#">Cui et al. (2006b)</a>
	c-Hras promoter hypomethylation in dietary methyl deficient mice, steatosis and microgranulomas	Liver (mouse)	C57BL/6J mice	2.6–14.6 $\mu$ g As(III)/g body weight/d (18.5 wk)	<a href="#">Okoji et al. (2002)</a>
	ER $\alpha$ promoter hypomethylation	Liver (mouse)	C3H mice (adult male with HCC after only in utero exposure)	85 ppm As(III) (GD 8–18)	<a href="#">Waalkes et al. (2004a)</a>
	ER $\alpha$ promoter hypomethylation, $\uparrow$ expression of ER $\alpha$ and cyclin CD1 mRNA and protein	Liver (mouse)	129/SvJ mice	45 ppm As(III) (48 wk)	<a href="#">Chen et al. (2004)</a>
	Hyper- and hypomethylation of VHL promoter	Kidney (human)	Human kidney cells (UOK123, UOK109, UOK121)	IC <sub>30</sub> , IC <sub>50</sub> , or IC <sub>80</sub> of each cell line: 7–93 $\mu$ M As(III) (4 wk)	<a href="#">Zhong and Mass (2001)</a>
Histone modification	$\downarrow$ Acetylation (H3K18ac) $\downarrow$ methylation (H3R17me)	Tumor (mouse)	1470.2 cells (mouse adenocarcinoma derived)	8 $\mu$ M sodium arsenite + 5 nM Dex (15 min)	<a href="#">Barr et al. (2009)</a>

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Key events	Observations	Observation organ system	Test system observed in	Dose (exposure duration) <sup>a</sup>	References
	↑ Histone acetylation (H3; lysine 14) and phosphorylation (H3; serine 10) at c-jun and c-fos chromatin, increased expression of c-jun and c-fos	Lung (human)	Human fibroblasts (WI-38 cells)	400 µM As(III), (up to 1 h)	<a href="#">Li et al. (2003)</a>
	↑ Histone H3acetylation (H3K9); inhibition of HDAC activity	Liver (human)	Human hepatoma HepG2 cells	5–10 µM As(III) (1 d)	<a href="#">Ramirez et al. (2008)</a>
	↓ Histone acetylation: H4K16, H3K9, K14, K18, K23	Bladder (human)	Human uroepithelial cells (UROtsa)	1–10 µM As(III) or 0.3–3 µM MMA(III) (up to 1 d)	<a href="#">Chu et al. (2011)</a>
	↓ H4; lysine 16 acetylation	Bladder (human)	Human bladder epithelial cells (UROtsa)	150 µM As(III), or 300 µM MMA(III) (1 d)	<a href="#">Jo et al. (2009a)</a>
	↓ H3 acetylation of FAM83A, DCB1, ZSCAN12, KRT7, C1QTNF6, FGF5; increased acetylation of KCNK10, NEFL	Bladder (human)	UROtsa and URO-ASSC urothelial cells	1 µM As(III), or 50 nM MMA(III) (52 wk)	<a href="#">Jensen et al. (2008)</a>
	↑ Permissive transcription histone modifications (DiMeK4; AcH3) ↓ repressive transcription histone modifications (TriMeK27, DiMeK9)	Bladder (human)	UROtsa and URO-ASSC urothelial cells	1 µM As(III), or 50 nM MMA(III) (52 wk)	<a href="#">Jensen et al. (2009b)</a>
	↓ H3K27 trimethylation, ↑ H3K9 dimethylation and H3K4 trimethylation (increase in HMT G9a protein and mRNA levels)	Lung (human)	A549 human lung adenocarcinoma cells	0.1–10 µM As(III) (1 d)	<a href="#">Zhou et al. (2008)</a>

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Key events	Observations	Observation organ system	Test system observed in	Dose (exposure duration) <sup>a</sup>	References
	↑ H3K4 trimethylation, maintained after inorganic arsenic removal = inherited through cell division	Lung (human)	A549 human lung adenocarcinoma cells	0.1–1 μM As(III) (1 or 7 d)	<a href="#">Zhou et al. (2009)</a>
	↑ H2AX phosphorylation	Skin (human)	Melanoma cells (RPMI7591)	1, 2.5, or 5 μM As(III) (1 d)	<a href="#">Zykova et al. (2006)</a>
	↑ H3K9me2 and ↓ H3K9ac with increased urinary inorganic arsenic; other histone marks correlated with water inorganic arsenic in gender specific manner	Blood (human)	Peripheral blood mononuclear cells (PBMC) (Bangladesh cohort [n = 40])	91.5 μg/L urinary inorganic arsenic (median) (unspecified)	<a href="#">Chervona et al. (2012)</a> ; <a href="#">Arita et al. (2012)</a>
	↑ H3K9me2; ↓ p16INK4a expression; no change in promoter DNA methylation	Liver (mouse)	C57Bl/6J mice	50 ppm sodium arsenite (6 mo)	<a href="#">Suzuki and Nohara (2013)</a>
Altered microRNA expression	Upregulation of hsa-miR-22,34a,221, 222 and downregulation of hsa-miR-210	Immune system (human)	Human immortalized lymphoblast cells (TK6 cell line)	≤2 μM As(III) (6 d)	<a href="#">Marsit et al. (2006a)</a>
	Downregulation of miRNA-19a—cell growth arrest and apoptosis	Bladder (human)	T24 human bladder carcinoma cells	4 μM As <sub>2</sub> O <sub>3</sub> (24 h)	<a href="#">Cao et al. (2011)</a>
	Upregulation of hsa-miR-2909; molecular responses linked to immune response	Immune system (human)	PBMCs	2 μM sodium arsenite (48 h)	<a href="#">Kaul et al. (2014)</a>

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Key events	Observations	Observation organ system	Test system observed in	Dose (exposure duration) <sup>a</sup>	References
	85 miRNA upregulated, 52 downregulated; predicted to be involved in regulating phosphoproteins and alternative gene splicing	Vascular system (human)	Umbilical vein endothelial cells	20 µM sodium arsenite (24 h)	<a href="#">Li et al. (2012)</a>
	hsa-miR-21 upregulation	Embryonic, lung (human)	HELF	1 µM sodium arsenite (up 30 cell passages)	<a href="#">Ling et al. (2012)</a>
<b>Cellular phenotypic changes</b>					
Malignant transformation	Transformation of HELF cells via increased ROS→ERK/NF-κB activation→hsa-miR-21 upregulation	Embryonic, lung (human)	HELF	1 µM sodium arsenite (up 30 cell passages)	<a href="#">Ling et al. (2012)</a>
	Transformation of p53 knocked down HBECs; downregulated hsa-miR-200b via promoter methylation	Lung (human)	p53(low) human bronchial epithelial cells	2.5 µM sodium arsenite (16 wk)	<a href="#">Wang et al. (2011)</a>
	Altered H3 and H4 acetylation during malignant transformation	Bladder (human)	UROtsa and URO-ASSC urothelial cells	1 µM As(III), or 50 nM MMA(III) (52 wk)	<a href="#">Jensen et al. (2008)</a>
	Increase in “permissive” histone modifications AcH3 and DiMeK4; repressive modifications TriMeK27 and DiMeK9 were decreased → noncanonical WNT5A signaling and malignant transformation	Bladder (human)	UROtsa and URO-ASSC urothelial cells	50 nM MMA(III) (24+ wk)	<a href="#">Jensen et al. (2009b)</a>

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Key events	Observations	Observation organ system	Test system observed in	Dose (exposure duration) <sup>a</sup>	References
	Genome-wide changes in promoter DNA methylation, increasing with duration of exposure, in parallel with phenotypic changes (transformation)	Bladder (human)	UROtsa and URO-ASSC urothelial cells	1 µM As(III), or 50 nM MMA(III) (up to 52 wk)	<a href="#">Jensen et al. (2009a)</a>
<b>Tissue/organ responses</b>					
Skin lesions	Development of skin lesions associated with inorganic arsenic exposure and PBL hypomethylation	Skin/blood (human)	PBL DNA in individuals with skin lesions (Araihazar, Bangladesh)	121 µg/L urinary As (>2 yr)	<a href="#">Pilsner et al. (2009)</a>
	Risk of skin lesions associated with DAPK and p16 hypermethylation	Skin and blood (human)	PBL DNA in individuals (West Bengal, India)	567.25 µg/L mean urinary As(III) (with lesions) Mean urine As(III) 495.48 µg/L mean urinary As(III) (without lesions), 567.25 µg/L (with lesions)	<a href="#">Banerjee et al. (2013)</a>
Adverse liver effects	Hepatic steatosis with DNA hypomethylation	Liver (mouse)	129/SvJ mice	45 ppm As(III) (48 wk)	<a href="#">Chen et al. (2004)</a>
	Hepatocellular carcinoma	Liver (mouse)	Adult male C3H mice with HCC after only in utero exposure	85 ppm As(III) (GD 8–18)	<a href="#">Waalkes et al. (2004a)</a>
	Steatosis and microgranulomas with c-Hras promoter hypomethylation in dietary methyl deficient mice	Liver (mouse)	C57BL/6J mice	2.6–14.6 µg As(III)/g body weight/d (18.5 wk)	<a href="#">Okoji et al. (2002)</a>

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Key events	Observations	Observation organ system	Test system observed in	Dose (exposure duration) <sup>a</sup>	References
<b>Individual responses</b>					
Contextual memory deficits	<p>↓ Freezing behavior</p> <p>*Highest dose group: significant at all time points 2–4 mo of age</p> <p>Lowest dose group: significant at 1 time point at 2 mo of age; all time points at 3 and 4 mo of age</p>	Whole animal (rat)	Wistar rats	3 or 36 ppm sodium arsenite, (10 d prior to gestation through 1, 2, 3, or 4 mo postnatal development)	<a href="#">Martínez et al. (2011)</a>
<b>Susceptible individual response</b>					
Diet (e.g., deficiencies in methyl, folate, methionine)	Altered DNA methylation patterns in repetitive <i>Alu</i> and LINE DNA elements (high <i>Alu</i> methylation correlated with high inorganic arsenic exposure in low folate condition, and vice versa) following low levels of environmental exposure	Blood (human; elderly men)	Blood leukocyte DNA in human cohort study	0.02–1.45 µg/g toenail arsenic (unspecified)	<a href="#">Lambrou et al. (2012)</a>
	Hypermethylation, modified by folate	Blood (human)	PBL DNA	2–250 µg/L As(III) (>4 yr)	<a href="#">Pilsner et al. (2007)</a>
	Development of skin lesions associated with low folate	Skin/blood (human)	PBL DNA in individuals with skin lesions	2–250 µg/L As(III) (>2 yr)	<a href="#">Pilsner et al. (2009)</a>
	c-Hras promoter hypomethylation, steatosis and microgranulomas	Liver (mouse)	C57BL/6J mice	2.6–14.6 µg iAs (III)/g body weight/d (18.5 wk)	<a href="#">Okoji et al. (2002)</a>
	5357 CpG islands altered with high maternal folate + inorganic arsenic	Fetal liver (mouse)	CD-1 mice (pregnant females)	85 ppm As(III) (GD 8–18) + High maternal folate intake (11 mg/kg) (GD 5–18)	<a href="#">Tsang et al. (2012)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Observation organ system</b>	<b>Test system observed in</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
Life stage (in utero exposure)	Global hypomethylation w/high exposure, PP1 promoter hypomethylation, reduced fear memory	Brain (rat)	Wistar rats	3 or 36 ppm sodium arsenite (gestation to 4 mo postnatal development)	<a href="#">Martínez et al. (2011)</a>
	ER $\alpha$ promoter hypomethylation, HCC	Liver (mouse)	C3H mice (adult; male)	85 ppm As(III) (GD 8–18)	<a href="#">Waalkes et al. (2004a)</a>
	12 miRNAs upregulated (linked to cancer, diabetes, and immune response signaling pathways)	Blood (human)	Cord blood (Mexican women's cohort)	0.456–236 $\mu$ g/L inorganic arsenic in maternal drinking water inorganic arsenic range of 0.456–236 $\mu$ g/L; maternal urine inorganic arsenic range of 6.2–319.7 $\mu$ g/L inorganic arsenic in maternal urine (unspecified)	<a href="#">Rager et al. (2014)</a>
	5357 CpG islands altered with high maternal folate + inorganic arsenic	Fetal liver (mouse)	CD-1 mice (pregnant females)	85 ppm As(III) (GD 8–18) + High maternal folate intake (11 mg/kg) for (GD 5–18)	<a href="#">Tsang et al. (2012)</a>
Gender	Males: ↓ DNA methylation; ↓ DNMT1 expression (no change in SAM content)  Females: ↑ DNA methylation in females (no change in DNMT1 levels) ↓ SAM content	Liver (mouse)	C57BL/6J mice	50 ppm sodium arsenite + methyl-deficient diet ad libitum (5 mo)	<a href="#">Nohara et al. (2011)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Observation organ system</b>	<b>Test system observed in</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
Genetics	AS3MT haplotype associated with efficient inorganic arsenic metabolism, methylation of AS3MT gene region and reduced AS3MT mRNA expression	Blood/skin (human)	Human peripheral blood (Argentinian women)	188 µg/L mean total urinary arsenic (unspecified)	<a href="#">Engström et al. (2013)</a>
<b>Population response</b>					
Hypermethylation of genes related to diseases associated with inorganic arsenic (e.g., cancer, heart disease, diabetes)	182 hypermethylated genes related to tumor suppression (e.g., forkhead box F1 [FoxF1], matrix metalloproteinase 15 [MMP15])	Peripheral blood lymphocytes (human)	Females ( <i>n</i> = 8) with inorganic arsenical skin lesions in Zimapan, Hidalgo State, Mexico; compared to females ( <i>n</i> = 8) without lesions	63.47 µg/g total arsenic in urinary creatinine (average) (unspecified)	<a href="#">Smeester et al. (2011)</a>
Inorganic arsenic induced bladder cancer risk	Promoter methylation silencing of tumor suppressor genes (p16, RASSF1A, PRSS3) and soluble Frizzled receptor proteins (SFRPs) in 30–50% of bladder cancer cases	Bladder tumors (human)	Participants in population-based case-control study of bladder cancer in New Hampshire, U.S.	≤0.26 µg/g toenail arsenic (unspecified)	<a href="#">Marsit et al. (2006c)</a> ; <a href="#">Marsit et al. (2006b)</a>
Inorganic arsenic-induced skin cancer risk	Dose-related increase in hypermethylation of p53 gene in inorganic arsenic exposed individuals compared to controls and individuals with inorganic arsenic-induced skin cancer patients	Blood (human)	Human subjects in Kolkata, India (individuals with inorganic arsenic-associated skin cancer and nonarsenic cancer)	Controls: <50 µg/L inorganic arsenic in drinking water  Exposed: 51–1,000 µg/L inorganic arsenic in drinking water (9.5–19 yr)	<a href="#">Chanda et al. (2006)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Observation organ system</b>	<b>Test system observed in</b>	<b>Dose (exposure duration)<sup>a</sup></b>	<b>References</b>
Inorganic arsenic-induced skin lesions	Development of skin lesions associated with low folate	Skin/blood (human)	PBL DNA in individuals with skin lesions	2–250 µg/L As(III) (>2 yr)	<a href="#">Pilsner et al. (2009)</a>

DAPK = death-associated protein kinase; GD = gestational day; HCC = hepatocellular carcinoma;

HELFL = embryonic lung fibroblasts; PBL = peripheral blood lymphocyte; TK = toxicokinetics.

<sup>a</sup>Abbreviations used for exposure durations: minutes (min), hours (h), days (d), weeks (wk).

<sup>b</sup>Exposure durations are characterized as “unspecified” when a study does not explicitly state the exposure duration.

**Table A-4. Preliminary data on effects mediated by oxidative stress – relevant health effects: cardiovascular disease, diabetes, liver disease, lung cancer, bladder cancer, neurotoxicity, nonmalignant respiratory disease, pregnancy outcomes, renal disease, skin cancer, and skin lesions**

Key events	Observations	Organ system	Test system	Dose (exposure duration)	References
<b>Molecular initiating events</b>					
Reaction with O <sub>2</sub> (intermediate arsine species; e.g., dimethylarsine)	↑ Free radicals (e.g., dimethylarsenic peroxy radical [(CH <sub>3</sub> ) <sub>2</sub> AsOO], superoxide anion)	Multiple (see review article)	Multiple (see review article)	Multiple (see review article)	Reviewed in <a href="#">Flora (2011)</a>
Reaction with ferritin (methylated-As)	Redox-active Fe release	Multiple (see review article)	Multiple (see review article)	Multiple (see review article)	Reviewed in <a href="#">Flora (2011)</a>
Oxidation of As(III) to As(V)	H <sub>2</sub> O <sub>2</sub> formation followed by Fenton reaction (hydroxyl radical formation)	Multiple (see review article)	Multiple (see review article)	Multiple (see review article)	Reviewed in <a href="#">Flora (2011)</a> ; <a href="#">Jomova and Valko (2011)</a>
Reactions with NADPH oxidase	↓ ROS with NADPH inhibitor	Liver (human)	Human immortalized liver cell line HL-7702	Diphenylene-iodonium chloride (30 min pretreatment) + 5 μM arsenite (2 h)	<a href="#">Li et al. (2014)</a> ; Reviewed in <a href="#">Flora (2011)</a>
Reactions with mitochondrial respiratory chain	↓ ROS with mitochondrial respiratory chain inhibitor	Liver (human)	Human immortalized liver cell line HL-7702	Rotenone (30 min pretreatment) + 5 μM arsenite (2 h)	<a href="#">Li et al. (2014)</a> ; Reviewed in <a href="#">Flora (2011)</a>
<b>Biochemical responses</b>					
Generation of reactive oxygen species	↓ Dichlorofluorescein diacetate (peroxides)	Skin (human)	HaCaT transformed keratinocytes	0.5 μM trivalent arsenic (As[III]) (24 h)	<a href="#">Snow et al. (2005)</a>
		Lung (human)	WI38 human diploid lung fibroblast	0.5 μM trivalent arsenic (As[III]) (24 h)	
	↑ H <sub>2</sub> O <sub>2</sub> ↑ Superoxide	Lung (rat)	LECs	≤1 μM sodium arsenite (30 min)	<a href="#">Li et al. (2011)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration)	References
	↑ Superoxide	Liver (mouse)	Liver SECs	2.5–5 μM arsenite (30 min)	<a href="#">Straub et al. (2008)</a>
	↑ 2',7'-dichlorofluorescein-diacetate	Liver (human)	Human immortalized liver cell line HL-7702	5 μM arsenite (2 h)	<a href="#">Li et al. (2014)</a>
	↑ H <sub>2</sub> O <sub>2</sub> Cotreatment with antioxidants prevents ↑	Liver (rat)	Wistar rats (male, albino) (liver microsomes)	100 ppm sodium arsenite (30 d)	<a href="#">Ramanathan et al. (2003)</a>
		Kidney (rat)	Wistar rats (male, albino) (kidney microsomes)	100 ppm sodium arsenite (30 d)	<a href="#">Ramanathan et al. (2003)</a>
	Dose dependent ↑ CM-H <sub>2</sub> DCFDA fluorescence (general ROS indicator). Cotreatment with antioxidants mitigates ↑ Latent ↑ with MMA(III) compared with As(III) (no ↑ at 10 min)	Urothelium (human)	UROtsa cells	1–100 μM NaAsO <sub>2</sub> (10 min)	<a href="#">Eblin et al. (2006)</a>
				50 - 500 nM MMA(III) (30 min)	
	↑ CM-H <sub>2</sub> DCFDA Cotreatment with antioxidants mitigates ↑	Urothelium (human)	UROtsa cells	10 μM NaAsO <sub>2</sub> (10 min)	<a href="#">Eblin et al. (2008)</a>
500 nM MMA(III) (10 min)					
Time-dependent ↑ CM-H <sub>2</sub> DCFDA fluorescence. Significant ↑ only at 12 wk	Urothelium (human)	UROtsa cells	50 nM MMA(III) (4–12 wk)	<a href="#">Wnek et al. (2011)</a>	
Mitochondrial activity changes	↑ Colocalization of ROS and mitochondria staining	Liver (human)	Human immortalized liver cell line HL-7702	5 μM arsenite (2 h)	<a href="#">Li et al. (2014)</a>
Alteration in glutathione and other nonenzymatic antioxidant levels	↓ GSH	Brain (mouse)	Swiss mice (male albino)	0.5 or 1 As <sub>2</sub> O <sub>3</sub> mg/kg (45 d)	<a href="#">Rao and Avani (2004)</a>
		Brain (rat)	Sprague-Dawley rats (male)	0.05, 0.10, 0.30, 3.0 ppm Na <sub>3</sub> AsO <sub>4</sub> (40 d)	<a href="#">Chaudhuri et al. (1999)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration)	References
		Lung (rat)	LECs	2 µM sodium arsenite (≤30 min)	<a href="#">Li et al. (2011)</a>
	↓ GSH ↓ Ascorbic acid ↓ α-tocopherol Cotreatment with antioxidants prevents ↓	Liver (rat)	Wistar rats (male, albino) (liver microsomes)	100 ppm sodium arsenite (30 d)	<a href="#">Ramanathan et al. (2003)</a>
		Kidney (rat)	Wistar rats (male, albino) (kidney microsomes)	100 ppm sodium arsenite (30 d)	<a href="#">Ramanathan et al. (2003)</a>
	↑ GSH	Pancreas (rat)	Wistar rats (male)	1.7 mg/kg NaAs <sup>+3</sup> O <sub>2</sub> (every 12 h/90 d)	<a href="#">Izquierdo-Vega et al. (2006)</a>
		Pancreas (rat)	INS-1(832/13) cells (rat β-cells)	0.25–0.5 µM arsenite (96 h)	<a href="#">Fu et al. (2010)</a>
		Lung (rat)	LECs	2 µM sodium arsenite (2–8 h)	<a href="#">Li et al. (2011)</a>
Depletion of micronutrients	↓ Ascorbate ↓ Fe(II)	Liver (human)	Human immortalized liver cell line HL-7702	5 µM arsenite (12 h)	<a href="#">Li et al. (2014)</a>
Enzyme activity changes	↓ SOD dismutase ↓ catalase	Brain (mouse)	Swiss mice (male albino)	0.5 or 1 mg/kg As <sub>2</sub> O <sub>3</sub> (45 d)	<a href="#">Rao and Avani (2004)</a>
	↓ SOD dismutase ↓ catalase ↓ glutathione reductase	Brain (rat)	Sprague-Dawley rats (male)	0.05, 0.10, 0.30, 3.0 ppm Na <sub>3</sub> AsO <sub>4</sub> (40 d)	<a href="#">Chaudhuri et al. (1999)</a>
	↑ DNA ligase	Lung (human)	WI38 human diploid lung fibroblast	0.5–1 µM As(III) (24 to 120 h)	Reviewed in <a href="#">Snow et al. (2005)</a>
	↓ DNA ligase			5 or 10 µM As(III) (24 to 120 h)	
	Rac1-GTPase activation NADPH Oxidase activation (N <sub>ox</sub> 2-based)	Liver (mouse)	C57BL/6 Tac Mice (in vivo and ex vivo liver SECs)	In vivo: 250 ppb sodium arsenite (5 wk) Ex vivo: 2.5 µM sodium arsenite (8 h)	<a href="#">Straub et al. (2008)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration)	References
	↑ NADPH Oxidase (inferred) ↑ Propyl hydroxylase (PHDs) (inactivates HIF-1α)	Liver (human)	Human immortalized liver cell line HL-7702	5 μM arsenite (12 h)	<a href="#">Li et al. (2014)</a>
	↑ Hemeoxygenase ↓ Cytochrome P450 ↓ Cytochrome b5 ↓ NADPH-cyt P450 reductase ↑/↓ Mitigated by antioxidants	Liver (rat)	Wistar rats (male, albino) (liver microsomes)	100 ppm sodium arsenite (30 d)	<a href="#">Ramanathan et al. (2003)</a>
		Kidney (rat)	Wistar rats (male, albino) (kidney microsomes)	100 ppm sodium arsenite (30 d)	<a href="#">Ramanathan et al. (2003)</a>
	↓ TrxR	Pancreas (rat)	Wistar rats (male)	1.7 mg/kg NaAs <sup>+3</sup> O <sub>2</sub> (every 12 h/90 d)	<a href="#">Izquierdo-Vega et al. (2006)</a>
	↓ Poly(ADP-ribose) polymerase-1 (PARP-1) ↑ activity if MMA(III) exposure is discontinued for 2 wk prior to measurement in cells previously exposed for 4 or 8 wk	Urothelium (human)	UROtsa cells	50 nM MMA(II) (4–12 wk)	<a href="#">Wnek et al. (2011)</a>
Protein expression and/or level changes	Western Blot: ↑ Base excision repair proteins (DNA polymerase β, DNA ligase I)	Skin (human)	Human Keratinocyte Cells (HaCaT)	0.1–1 μM As(III) (24 h)	Reviewed in <a href="#">Snow et al. (2005)</a>
	↓ Base excision repair proteins			5–10 μM As(III) (24 h)	
	Western blot: ↑ Base excision repair proteins (DNA polymerase β, DNA ligase I)	Lung (human)	WI38 human diploid lung fibroblast	0.1–1 μM As(III) (24 h)	Reviewed in <a href="#">Snow et al. (2005)</a>
	↓ Base excision repair proteins			5–10 μM As(III) (24 h)	
	mRNA and Western Blot: ↑ NRF1 ↑ NRF2	Skin (human)	Immortalized human keratinocyte cells (HaCaT)	>5 μM inorganic arsenite (As[III]) (6 h)	<a href="#">Zhao et al. (2012)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)</b>	<b>References</b>
	Western Blot: ↑ Nrf2	Lung (mouse)	Mice (unspecified strain; wild type and Nrf2-knockout)	0.48 mg/m <sup>3</sup> synthetic dust (10% arsenic trioxide + inert background dust) (30 min/d/14 d)	<a href="#">Zheng et al. (2012)</a>
	Western Blot: ↑ Cu/Zn SOD, thioredoxin Mitigated by antioxidants	Lung (rat)	LECs	2 μM sodium arsenite (16 wk)	<a href="#">Li et al. (2011)</a>
	Immunofluorescence: ↑ PECAM-1	Liver (mouse)	C57BL/6 Tac mice (in vivo and ex vivo liver SECs)	In vivo: 250 ppb sodium arsenite (5 wk) ex vivo: 1–5 μM sodium arsenite (8 h)	<a href="#">Straub et al. (2008)</a>
	Western Blot: ↑ HIF-1α	Liver (human)	Human immortalized liver cell line HL-7702	5 μM arsenite (12 h)	<a href="#">Li et al. (2014)</a>
	Western Blot: ↑ VEGF	Liver (human)	Human immortalized liver cell line HL-7702	1–5 μM arsenite (12 h)	<a href="#">Li et al. (2014)</a>
	Western Blot: ↑ Nrf nuclear fraction ↑ ARE luciferase activity; ↑ expression of downstream targets mRNA (e.g., Hmox1, NAD[P]H, catalase)	Pancreas (rat)	INS-1(832/13) cells (rat β-cells)	0.25–0.5 μM arsenite (96 h)	<a href="#">Fu et al. (2010)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)</b>	<b>References</b>
	Western Blot: ↑ Hsp70 (stress protein)	Urothelium (human)	UROtsa cells	1 μM NaAsO <sub>2</sub> (30 min) 10 μM NaAsO <sub>2</sub> (30–240 min)	<a href="#">Eblin et al. (2006)</a>
	Western Blot: ↑ metallothionein (stress protein)			50 nM–5 μM MMA(III) (30–240 min)	
				1 μM NaAsO <sub>2</sub> (240 min) 10 μM NaAsO <sub>2</sub> (30–240 min)	
				50 nM–5 μM MMA(III) (30–240 min)	
	mRNA and Western Blot: ↑ PARP-1 No effect on expression if MMA(III) exposure is discontinued for 2 wk prior to measurement in cells previously exposed for 4 or 8 wk	Urothelium (human)	UROtsa cells	50 nM MMA(III) (4–12 wk)	<a href="#">Wnek et al. (2011)</a>
	Western blot: ↑ Cox-2 Levels normalize by 24 h. Cotreatment with SOD or melatonin block induction; no effect of catalase	Urothelium (human)	UROtsa cells	1 μM sodium arsenite (4 h); or 50 nM MMA(III) (4 h)	<a href="#">Eblin et al. (2008)</a>
	mRNA: ↑ Cox-2 Levels normalize by 24 h Cotreatment with catalase, SOD, or melatonin block induction	Urothelium (human)	UROtsa cells	1 μM sodium arsenite (4 h); or 50 nM MMA(III) (4 h)	<a href="#">Eblin et al. (2008)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration)	References
	Western blot: ↓ Mn SOD No change in Mn SOD with As(III) treatment; very little change in catalase with either As(III) or MMA(III) treatments	Urothelium (human)	UROtsa cells	50 nM MMA(III) (1 to 24 h)	<a href="#">Eblin et al. (2008)</a>
	Western blot: ↑ Cu/Zn SOD ↓ after 24 h MMA(III) exposure	Urothelium (human)	UROtsa cells	1 μM sodium arsenite (0.5–24 h) 50 nM MMA(III) (0.5–4 h)	<a href="#">Eblin et al. (2008)</a>
Cell membrane disruption	↑ Lipid peroxidation	Brain (mouse)	Swiss mice (male albino)	0.5 or 1 mg/kg As <sub>2</sub> O <sub>3</sub> (45 d)	<a href="#">Rao and Avani (2004)</a>
		Brain (rat)	Sprague-Dawley rats (male)	0.05, 0.10, 0.30, 3.0 ppm Na <sub>3</sub> AsO <sub>4</sub> (40 d)	<a href="#">Chaudhuri et al. (1999)</a>
		Liver (mouse)	BALB/c mice (male)	3.2 mg/L As(III)/As(V) (6 mo)	<a href="#">Santra et al. (2000)</a>
		Liver (rat)	Wistar rats (male, albino) (liver microsomes)	100 ppm sodium arsenite (30 d)	<a href="#">Ramanathan et al. (2003)</a>
		Kidney (rat)	Wistar rats (male, albino) (Kidney microsomes)	100 ppm sodium arsenite (30 d)	<a href="#">Ramanathan et al. (2003)</a>
		Pancreas (rat)	Wistar rats (male)	1.7 mg/kg NaAs <sup>+3</sup> O <sub>2</sub> (every 12 h/90 d)	<a href="#">Izquierdo-Vega et al. (2006)</a>
DNA, chromosomal damage	Oxidative DNA damage (↑ anti-8-Oxo-dG staining)	Lung (mouse)	Mice (unspecified strain; wild type and Nrf2-knockout)	0.48 mg/m <sup>3</sup> synthetic dust (10% arsenic trioxide + inert background dust) (30 min/d/14 d)	<a href="#">Zheng et al. (2012)</a>
	Oxidative DNA damage (↑ 8-OHdG staining)	Blood (human)	Human population	10.88 to 19.05 μg/gCr urinary arsenic (40–70 yr)	<a href="#">Pei et al. (2013)</a>
		Urothelium (human)	UROtsa cells	1–10 μM NaAsO <sub>2</sub> (30 min)	<a href="#">Eblin et al. (2006)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration)	References
	Oxidative DNA damage (↑ anti-8-Oxo-dG levels measured by HPLC-ECD)			50 nM MMA(III) (30 min) 50 nM–5 μM MMA(III) (60 min)	
	↓ Anti-8-Oxo-dG levels measured by HPLC-ECD			1–10 μM NaAsO <sub>2</sub> (60 min)	
	↑ DNA single-strand breaks (comet assay and flow cytometry)	Urothelium (human)	UROtsa cells	50 nM MMA(II) (4–12 wk)	<a href="#">Wnek et al. (2011)</a>
Gene expression changes	↑ NRF2 and ARE dependent genes (HMOX-1, NQO1, GCLC, GCLM, SRX)	Skin (human)	Immortalized human keratinocyte cells (HaCaT)	1.25–40 μM inorganic arsenite (As[III]) (6 h)	<a href="#">Zhao et al. (2012)</a>
	↑ Nrf2 targets (NQO1, γGCS, HO-1)	Lung (mouse)	Mice (unspecified strain; wild type and Nrf2-knockout)	0.48 mg/m <sup>3</sup> synthetic dust [10% arsenic trioxide + inert background dust] (30 min/d/14 d)	<a href="#">Zheng et al. (2012)</a>
	Altered gene expression related to: oxidative stress (↑ HMOX1); protein folding (↓ FKB5) Thioredoxin reductase (↑ TXNRDI) Metallothionein regulation (↑ MT1E) DNA damage sensing (↓ DDB2) Thioredoxin (↑ TXN) Cell adhesion/growth (↑ LGALS8) Immune response (↓ THBD)	Urothelium (human)	Human uroepithelial cells from kidney donor ureter segments	6 μM As(III) + MMA(V) + DMA(V) (24 h); or 6 μM As(III) + MMA(III) + DMA(III) (24 h)	<a href="#">Yager et al. (2013); Clewell et al. (2011)</a>
	Alterations in genes related to: inflammatory signaling, epithelial-to-mesenchymal transition, cell cycle control, and apoptosis/survival signaling	Urothelium (human)	Human uroepithelial cells from kidney donor ureter segments	0.06 μM inorganic arsenic and trivalent or pentavalent metabolites (24 h)	<a href="#">Clewell et al. (2011)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)</b>	<b>References</b>
	↑ Adaptive gene response (delay apoptosis, preinflammatory)	Various	Various	≤0.01 μM various arsenic species (various exposure durations)	<a href="#">Gentry et al. (2010)</a> Review
	Altered gene expression related to: oxidative stress, proteotoxicity, inflammation, and proliferative signaling, DNA repair, cell cycle, G2/M checkpoint control, and induction of apoptosis	Various	Various	0.1–10 μM various arsenic species (various exposure durations)	<a href="#">Gentry et al. (2010)</a> Review
	Altered apoptotic gene expression	Various	Various	10–100 μM various arsenic species (various exposure durations)	<a href="#">Gentry et al. (2010)</a> Review
	760 alternations in gene expression, generally related to: oxidative stress (e.g., NQO1) Lipid metabolism (e.g., ALDH2) Inflammatory response (e.g., IL8, MAPK1)	Urothelium (human)	UROtsa cells	1 μM MMA(III) (24 h)	<a href="#">Bailey et al. (2012)</a>
	176 alternations in gene expression, generally related to: oxidative stress (e.g., TNF) Lipid metabolism (e.g., AKT3) Inflammatory response (e.g., IL8, IL6)	Urothelium (human)	UROtsa cells	1 μM DMA(III) (24 h)	<a href="#">Bailey et al. (2012)</a>
	Genes in ERK 1/2 MAPK and NF-KB signaling pathways	Urothelium (human)	UROtsa cells	1 μM MMA(III) or DMA(III) (24 h)	<a href="#">Bailey et al. (2012)</a>
Cell signaling changes (numerous; examples provided here—see review article for details)	Transcription factors (e.g., Nrf2, HIF-1α, NF-κB)				Reviewed in <a href="#">Flora (2011)</a>
	NF-κB (↑ p-p65)	Lung (mouse)	Mice (unspecified strain; wild type and Nrf2-knockout)	0.48 mg/m <sup>3</sup> synthetic dust (10% arsenic trioxide + inert background dust) (30 min/d/14 d)	<a href="#">Zheng et al. (2012)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration)	References
	MAPKs				Reviewed in <a href="#">Flora (2011)</a>
	Erk (Ras, Raf, MEK, ERK activation)	Lung (rat)	LECs	100 µM B[α]P (24 h) 2 µM sodium arsenite (16 wk)	<a href="#">Li et al. (2011)</a>
	Tyrosine phosphorylation				Reviewed in <a href="#">Flora (2011)</a>
	↑ p-Epidermal growth factor receptor	Lung (human)	Transformed human bronchial cells (BEAS)	500 µM sodium arsenite (20 min)	<a href="#">Wu et al. (1999)</a>
<b>Cellular responses</b>					
Cytotoxicity/ viability, proliferation, apoptosis	↑ Cytotoxicity ↑ apoptosis	Skin (human)	Immortalized human keratinocyte cells (HaCaT)	>10 µM As(III) (24 h)	<a href="#">Zhao et al. (2012)</a>
	↓ Cell viability ↑ mitigated by natural Nrf2-inducer	Lung (human)	Human bronchial epithelium cells (16HBE14o)	≤1 µM As(III) (48 h)	<a href="#">Tao et al. (2013)</a>
	↑ TUNEL labeling	Lung (mouse)	Mice (unspecified strain; wild type and Nrf2-knockout)	0.48 mg/m <sup>3</sup> synthetic dust (10% arsenic trioxide + inert background dust) (30 min/d/14 d)	<a href="#">Zheng et al. (2012)</a>
	↑ Proliferation	Lung (rat)	LECs	2 µM sodium arsenite (24 h)	<a href="#">Li et al. (2011)</a>
	↑ Cell viability ↓ cell viability Reduced Nrf2 expression sensitizes cells to viability change; activation of Nrf2 mitigates effects	Bladder (human)	Human bladder urothelium cell line (UROtsa)	5–10 µM As(III) (24 h) 20–80 µM As(III) (24 h)	<a href="#">Wang et al. (2007)</a>
	↓ Cell viability Cotreatment with antioxidants other than catalase prevents ↓	Bladder (human)	Human bladder urothelium cell line (UROtsa)	1 µM sodium arsenite (24 h)	<a href="#">Eblin et al. (2008)</a>
	No ↓ cell viability			50 nM MMA(III) (24 h)	

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Key events	Observations	Organ system	Test system	Dose (exposure duration)	References
Epithelial-mesenchymal transition	Colony formation, ↓ epithelial protein markers ↑ mesenchymal protein markers Mitigated by antioxidant treatment	Lung (rat)	LECs	100 μM B[α]P (24 hr) 2 μM sodium arsenite (16 wk)	<a href="#">Li et al. (2011)</a>
Cell matrix changes	↓ Porosity	Liver (mouse)	C57BL/6 Tac Mice (in vivo and ex vivo liver SECs)	In vivo: 250 ppb sodium arsenite (5 wk) Ex vivo: 1–5 μM sodium arsenite (8 h)	<a href="#">Straub et al. (2008)</a>
Functional changes	↓ Insulin production ↓ glucagon production	Pancreas (rat)	Wistar Rats (male)	1.7 mg/kg NaAs <sup>+3</sup> O <sub>2</sub> (every 12 h/90 d)	<a href="#">Izquierdo-Vega et al. (2006)</a>
	↓ Insulin secretion in response to glucose ↑ Insulin secretion in response to potassium chloride	Pancreas (rat)	INS-1(832/13) cells (Rat β-cells)	0.25–0.5 μM arsenite (96 h)	<a href="#">Fu et al. (2010)</a>
Malignant transformation	↑ Multinucleated cells, morphological changes (confocal microscopy) tumor formation in in vivo xenografts	Urothelium (human)	UROtsa cells	0.05 μM MMA(III) (24–52 wk)	<a href="#">Bredfeldt et al. (2006)</a>
<b>Tissue/organ responses</b>					
Tissue remodeling	↑ Alveolar septa thickening, collagen deposition, fibroblast proliferation, pneumocyte hyperplasia	Lung (mouse)	Mice (unspecified strain; wild type and Nrf2-knockout)	0.48 mg/m <sup>3</sup> synthetic dust (10% arsenic trioxide + inert background dust) (30 min/d/14 d)	<a href="#">Zheng et al. (2012)</a>
Inflammatory response	↑ Inflammatory cells in BAL fluid ↑ TNF-α, IL-6 in BAL fluid ↑ Th2 cytokines (IL-3, IL-4) ↑ Chemokines (TGF-β, MCP-1) ↑ mitigated by natural Nrf2-inducer	Lung (mouse)	Mice (unspecified strain; wild type and Nrf2-knockout)	0.48 mg/m <sup>3</sup> synthetic dust (10% arsenic trioxide + inert background dust) (30 min/d/14 d)	<a href="#">Zheng et al. (2012)</a>

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Key events	Observations	Organ system	Test system	Dose (exposure duration)	References
	↑ TNF- $\alpha$ , IL-1 $\beta$ , IFN $\gamma$	Placenta (human)	Human population	>60 $\mu$ g/L urinary arsenic at gestational Week 30	<a href="#">Ahmed et al. (2011)</a>
Vascular remodeling	Sinusoidal capillarization ↓ nutrient/waste exchange	Liver (mouse)	C57BL/6 Tac mice (in vivo and ex vivo liver SECs)	In vivo: 250 ppb sodium arsenite (5 wk) Ex vivo: 8 h	<a href="#">Straub et al. (2008)</a>
Endocrine signaling changes	↑ Fasting serum glucose ↑ Blood insulin	Pancreas (rat)	Wistar rats (male)	1.7 mg/kg NaAs <sup>+3</sup> O <sub>2</sub> (every 12 h/90 d)	<a href="#">Izquierdo-Vega et al. (2006)</a>
<b>Individual responses</b>					
Diabetes (Inferred from insulin resistance)	Insulin resistance	Blood (rat)	Wistar rats (male)	1.7 mg/kg NaAs <sup>+3</sup> O <sub>2</sub> (every 12 h/90 d)	<a href="#">Izquierdo-Vega et al. (2006)</a>
Liver disease	Hepatic fibrosis	Liver (mouse)	BALB/c mice (male)	3.2 mg/L (15 mo)	<a href="#">Santra et al. (2000)</a> Reviewed in <a href="#">Flora (2011)</a>
Nonmalignant respiratory disease	Allergic lung inflammation	Lung (mouse)	Mice (unspecified strain; wild type and Nrf2-knockout)	0.48 mg/m <sup>3</sup> synthetic dust (10% arsenic trioxide + inert background dust) (30 min/d/14 d)	<a href="#">Zheng et al. (2012)</a>
<b>Susceptible individual response</b>					
KEAP1 and/or NRF2 mutations	↑ NRF2 activity in skin cancer patients	Skin	Human population	Not applicable	<a href="#">Kim et al. (2010)</a> cited in <a href="#">Zhao et al. (2012)</a>
NADPH oxidase p22 subunit polymorphisms	↑ Hypertension risk in individuals with polymorphisms and high inorganic arsenic exposure	Cardio-vascular system	Human population	0.7–0.93 mg/L median inorganic arsenic in well water (>6 mo)	<a href="#">Hsueh et al. (2005)</a> ; Cited in <a href="#">Straub et al. (2008)</a>
Diabetics	↓ TrxR	Pancreas (rat)	Wistar rats (male)	1.7 mg/kg NaAs <sup>+3</sup> O <sub>2</sub> (every 12 h/90 d)	<a href="#">Izquierdo-Vega et al. (2006)</a> ; <a href="#">Schulze et al. (2004)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)</b>	<b>References</b>
Alcohol	Ethanol may augment oxidative stress and induction of angiogenic factors that would promote tumor growth	Cardio-vascular system	Human microvascular endothelial (HMVEC) cells	1–5 µM arsenite in presence or absence of 0.1% EtOH 24 h experiments	<a href="#">Klei and Barchowsky (2008)</a>
<b>Population response<sup>a</sup></b>					
Elevated oxidative stress	↑ Superoxide in plasma (chemiluminescence method) ↓ Plasma antioxidants	Plasma (human)	Human population (Taiwan)	9.60 µg/L average arsenic blood levels (average age: 64 yr)	<a href="#">Wu et al. (2001)</a>
	↑ Serum lipid peroxides ↓ nonprotein sulfhydryl levels in whole blood	Blood (human)	Human population (Inner Mongolia, China)	0.41 mg/L average arsenic blood levels (average: 18 yr)	<a href="#">Pi et al. (2002)</a>
Cardiovascular disease	Peripheral vascular disease, ischemic heart disease, acute myocardial infarction, atherosclerosis, hypertension	Cardio-vascular system	Human population	Varies	Cited by <a href="#">Straub et al. (2008)</a> Reviewed in <a href="#">Flora (2011)</a>
Bladder cancer	Elevated incidence of bladder cancer in populations exposed to relatively high inorganic arsenic concentrations (>100 µg/L in drinking water)	Bladder	Human population	Varies but generally >100 µg/L in drinking water	Reviewed in <a href="#">Cohen et al. (2013)</a>
Diabetes	Multiple measures (e.g., insulin resistance)	Endocrine system	Human population	Various	<a href="#">Maul et al. (2012)</a> ; cited in <a href="#">Fu et al. (2010)</a>
Liver cancer	↑ Serum epidermal growth factor receptor in liver cancer patients	Serum	Human case controls	Average 0.5–0.6 mg/L inorganic arsenic in drinking water	<a href="#">Sung et al. (2012)</a>
Liver disease	Portal hypertension, noncirrhotic liver fibrosis	Liver	Human population	Various	Cited in <a href="#">Straub et al. (2008)</a>
	Hepatic fibrosis, portal hypertension	Liver	Human population	Various	<a href="#">Santra et al. (1999)</a> ; Reviewed in <a href="#">Flora (2011)</a>

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<b>Key events</b>	<b>Observations</b>	<b>Organ system</b>	<b>Test system</b>	<b>Dose (exposure duration)</b>	<b>References</b>
Lung cancer	Inferred from EGFR activation in BEAS cells and ↑ EGFR in serum of liver cancer patients	Lung	Human population	Various	<a href="#">Sung et al. (2012)</a> ; <a href="#">Wu et al. (1999)</a>
Neurotoxicity	Peripheral neuropathy	Nervous system	Human population	Various	Cited by <a href="#">Rao and Avani (2004)</a>
Nonmalignant respiratory disease	Allergic lung inflammation	Lung	Human population	Various	Cited in <a href="#">Zheng et al. (2012)</a>
Pregnancy outcomes	Preeclampsia, preterm birth, chorioamnionitis, brain white matter damage, chronic lung disease in preterm infants	Placenta (human)	Human population	Various	Cited in <a href="#">Ahmed et al. (2011)</a>
Renal disease	Urinary cancer Renal insufficiency, necrosis, failure	Kidney	Human population	Various	Reviewed in <a href="#">Flora (2011)</a>
Skin disease (Bowmen’s Disease, cancer)	↑ Oxidative DNA adducts (8-OHdG) ↑ skin lesions	Skin	Human population	Various	<a href="#">Pei et al. (2013)</a> Reviewed in <a href="#">Yu et al. (2006)</a>

HPLC-ECD = high-performance liquid chromatography with electrochemical detection; LECs = lung epithelial cells; SECs = sinusoidal endothelial cells; TrxR = thioredoxin reductase.

<sup>a</sup>Note: Associations between disease in populations exposed to inorganic arsenic and oxidative stress relies primarily on observational population studies combined with indicators of oxidative stress in in vitro and/or in vivo studies in cell or tissue types relevant to the disease (e.g., cardiomyocytes for cardiovascular disease). Data directly linking inorganic arsenic exposure to disease through an oxidative stress MOA were not identified at the population level, although biomarkers of oxidative stress in populations exposed to inorganic arsenic have been identified.

## APPENDIX B. ELECTRONIC DATABASE SEARCH STRATEGIES

Table B-1. Database search strategy

Date of search	Database	Search string
1/2013 12/2013 12/2016	PubMed	("arsenic"[MeSH Terms] OR "arsenic"[All Fields]) OR "7440-38-2"[All Fields] OR "inorganic arsenic"[All Fields] OR "monomethylarsenic"[All Fields] OR "dimethylarsenic"[All Fields] OR "methyl arsenic"[All Fields] OR "monomethylarsonic acid"[All Fields] OR (124[All Fields] AND 58[All Fields] AND 3[All Fields]) OR "monomethylarsonous acid"[All Fields] OR "dimethylarsinic acid"[All Fields] OR "75-60-5"[All Fields] OR "dimethylarsinous acid"[All Fields] OR "arsenate"[All Fields] OR (12523[All Fields] AND 21[All Fields] AND 6[All Fields]) OR "arsenite"[All Fields] OR (7784[All Fields] AND 46[All Fields] AND 5[All Fields]) OR "cacodylic acid"[All Fields] NOT "arsenic trioxide"[All Fields]
1/2013 12/2013 12/2016	Web of Science	(TS=arsenic OR TS="7440-38-2" OR TS="inorganic arsenic" OR TS=monomethylarsenic OR TS=dimethylarsenic OR TS=methylarsenic OR TS="monomethylarsonic acid" OR TS="124-58-3" OR TS="monomethylarsonous acid" OR TS="dimethylarsinic acid" OR TS="cacodylic acid" OR TS="75-60-5" OR TS="dimethylarsinous acid" OR TS=arsenate OR TS="12523-21-6" OR TS=arsenite OR TS="7784-46-5") NOT TS="arsenic trioxide" NOT WC="Geochemistry Geophysics" NOT WC="Physics Applied" NOT WC="Physics Condensed Matter" NOT WC="Materials Science Coatings Films" NOT WC=Optics NOT WC="Chemistry Physical" NOT WC=Mechanics NOT WC="Instruments Instrumentation" NOT WC="Engineering Manufacturing" NOT WC="Materials Science Characterization Testing" NOT WC=Electrochemistry NOT WC="Metallurgy Metallurgical Engineering" NOT WC="Chemistry Analytical" NOT WC="Engineering Environmental" NOT WC="Materials Science Multidisciplinary" NOT WC="Chemistry Inorganic Nuclear" NOT WC="Engineering Electrical Electronic" NOT WC="Engineering Chemical" NOT WC=Spectroscopy NOT WC=Crystallography NOT WC="Engineering Civil" NOT WC="Nanoscience Nanotechnology" NOT WC=Mineralogy NOT WC="Physics Atomic Molecular Chemical" NOT WC="Mining Mineral Processing" NOT WC="Energy Fuels" NOT WC="Materials Science Paper Wood" NOT WC="Materials Science Ceramics" NOT WC="Materials Science Characterization Testing" NOT WC="Physics Nuclear" NOT WC="Polymer Science" NOT WC=Geology NOT WC=Limnology NOT WC="Engineering Manufacturing" NOT WC="Agricultural Engineering" NOT WC="Engineering Mechanical" NOT WC="Computer Science Hardware Architecture" NOT WC="Imaging Science Photographic Technology")
1/2013 12/2013 12/2016	Toxline	(7440-38-2 OR 124-58-3 OR 75-60-5 OR 7784-46-5 OR arsenic OR "inorganic + arsenic" OR monomethylarsenic OR dimethylarsenic OR methylarsenic OR "monomethylarsonic acid" OR "monomethylarsonous acid" OR "dimethylarsinic acid" OR "dimethylarsinous acid" OR arsenate OR arsenite OR arsenicals) NOT "arsenic trioxide"

Note: Assessing the use of arsenicals, primarily arsenic trioxide and Fowler's solution, as chemotherapeutic agents is not within the scope to the review.

## APPENDIX C. OFFICE OF HEALTH ASSESSMENT AND TRANSLATION (OHAT) ([NTP, 2013](#)) RISK-OF-BIAS QUESTIONS AND ASSESSMENT-SPECIFIC CLARIFICATIONS EXAMPLE

Table C-1. Risk-of-bias questions and rating guidelines—epidemiological studies

Rating	Guidelines and clarifications
<b>1. Was administered dose or exposure level adequately randomized?</b>	
++	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is direct evidence that subjects were allocated to any study group including controls using a method with a random component. Acceptable methods of randomization include: referring to a random number table, using a computer random number generator, coin tossing, shuffling cards or envelopes, throwing dice, or drawing of lots (<a href="#">Higgins and Green, 2011</a>). Restricted randomization (e.g., blocked randomization) to ensure particular allocation ratios will be considered low risk of bias. Similarly, stratified randomization and minimization approaches that attempt to minimize imbalance between groups on important prognostic factors (e.g., body weight) will be considered acceptable.</p> <p><b>Assessment-Specific Clarification:</b>  None.</p>
+	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is indirect evidence that subjects were allocated to study groups using a method with a random component (i.e., authors state that allocation was random, without description of the method used), <b>OR</b> it is deemed that allocation without a clearly random component during the study would not appreciably bias results. For example, approaches such as biased coin or urn randomization, replacement randomization, mixed randomization, and maximal randomization may require consultation with a statistician to determine risk-of-bias rating (<a href="#">Higgins and Green, 2011</a>).</p> <p><b>Assessment-Specific Clarification:</b>  None.</p>
-	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is indirect evidence that subjects were allocated to study groups using a method with a nonrandom component, <b>OR</b> there is insufficient information provided about how subjects were allocated to study groups. Nonrandom allocation methods may be systematic but have the potential to allow participants or researchers to anticipate the allocation to study groups. Such “quasi-random” methods include alternation, assignment based on date of birth, case record number, or date of presentation to study (<a href="#">Higgins and Green, 2011</a>).</p> <p><b>Assessment-Specific Clarification:</b>  None.</p>

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Rating	Guidelines and clarifications
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is direct evidence that subjects were allocated to study groups using a nonrandom method including judgment of the clinician, preference of the participant, the results of a laboratory test or a series of tests, or availability of the intervention (<a href="#">Higgins and Green, 2011</a>).  <b>Assessment-Specific Clarification:</b>  None.</p>
<b>2. Was allocation to study groups adequately concealed?</b>	
++	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is direct evidence that at the time of recruitment the research personnel and subjects did not know where study group subjects were allocated, and it is unlikely that they could have broken the blinding of allocation until after recruitment was complete and irrevocable. Methods used to ensure allocation concealment include central allocation (including telephone, web-based, and pharmacy-controlled randomization); sequentially numbered drug containers of identical appearance; sequentially numbered, opaque, sealed envelopes; or equivalent methods.  <b>Assessment-Specific Clarification:</b>  None.</p>
+	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is indirect evidence that the research personnel and subjects did not know where study group subjects were allocated, <b>OR</b> it is deemed that lack of adequate allocation concealment would not appreciably bias results.  <b>Assessment-Specific Clarification:</b>  None.</p>
-	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is indirect evidence that at the time of recruitment it was possible for the research personnel and subjects to know where study group subjects were allocated, or it is likely that they could have broken the blinding of allocation before recruitment was complete and irrevocable, <b>OR</b> there is insufficient information provided about allocation of study groups.  Note: Inadequate methods include using an open random allocation schedule (e.g., a list of random numbers), assignment envelopes used without appropriate safeguards (e.g., if envelopes were unsealed or nonopaque or not sequentially numbered), alternation, or rotation; date of birth; case record number; or any other explicitly unconcealed procedure. For example, if the use of assignment envelopes is described, but it remains unclear whether envelopes were sequentially numbered, opaque and sealed.  <b>Assessment-Specific Clarification:</b>  None.</p>
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is direct evidence that at the time of recruitment it was possible for the research personnel and subjects to know where study group subjects were allocated, or it is likely that they could have broken the blinding of allocation before recruitment was complete and irrevocable.  <b>Assessment-Specific Clarification:</b>  None.</p>

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Rating	Guidelines and clarifications
<b>3. Were the comparison groups appropriate?</b>	
++	<p><b>OHAT:</b>  <b>Cohort, Cross-Sectional:</b> There is direct evidence that subjects (both exposed and nonexposed) were similar (e.g., recruited from the same eligible population, recruited with the same method of ascertainment using the same inclusion and exclusion criteria, and were of similar age and health status), recruited within the same time frame, and had the similar participation/response rates.  <b>Case Control:</b> There is direct evidence that cases and controls were similar (e.g., recruited from the same eligible population including being of similar age, gender, ethnicity, and eligibility criteria other than outcome of interest as appropriate), recruited within the same time frame, and controls are described as having no history of the outcome. Note: A study will be considered low risk of bias if baseline characteristics of groups differed, but these differences were considered as potential confounding or stratification variables (see Question 4).  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> For ecological studies, a table of information or text on potential differences in characteristics that could bias results is provided, and these characteristics are adjusted for as potential confounders. There is direct evidence that subjects (both exposure groups and referent groups) were similar (e.g., of similar geographic region, ethnicity, socioeconomic status, etc.), <b>OR</b> baseline characteristics of groups differed but these differences were considered as potential confounding or stratification variables in analyses (see Question 4).  <b>Additional Guidance:</b>            Comparison groups selected adequately. Study provides table of subject characteristics by exposure levels and/or by case status. Cross-sectional studies can be considered low risk of bias if a general table of subject characteristics is provided and analyses are adjusted for confounders.</p>
+	<p><b>OHAT:</b>  <b>Cohort, Cross-Sectional:</b> There is indirect evidence that subjects (both exposed and nonexposed) were similar (e.g., recruited from the same eligible population, recruited with the same method of ascertainment using the same inclusion and exclusion criteria, and were of similar age and health status), recruited within the same time frame, and had the similar participation/response rates, <b>OR</b> differences between groups would not appreciably bias results.  <b>Case Control:</b> There is indirect evidence that cases and controls were similar (e.g., recruited from the same eligible population, recruited with the same method of ascertainment using the same inclusion and exclusion criteria, and were of similar age), recruited within the same time frame, and controls are described as having no history of the outcome, <b>OR</b> differences between cases and controls would not appreciably bias results.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is indirect evidence that subjects (both exposure groups and referent groups) were similar (e.g., of similar geographic region, ethnicity, socioeconomic status), <b>OR</b> differences between groups would not appreciably bias results.  <b>Additional Guidance:</b>            Recruitment methods stated to be similar, but no table of information or text provided on potential differences in study subjects' characteristics that could bias results, <b>OR</b> no breakdown of subject characteristics by exposure group (or by case status) to display potential differences. For ecological studies, groups are stated to be similar, but no table of information or text is provided on potential characteristic differences that could bias results.</p>

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Rating	Guidelines and clarifications
-	<p><b>OHAT:</b>  <b>Cohort, Cross-Sectional:</b> There is indirect evidence that subjects (both exposed and nonexposed) were not similar, recruited within very different time frames, or had very different participation/response rates, <b>OR</b> there is insufficient information provided about the comparison group including a different rate of nonresponse without an explanation.  <b>Case Control:</b> There is direct evidence that controls were drawn from a very dissimilar population than cases or recruited within very different time frames, <b>OR</b> there is insufficient information provided about the appropriateness of controls including rate of response reported for cases only.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is indirect evidence that subjects (both exposure groups and referent groups) were not similar (e.g., of similar geographic region, ethnicity, socioeconomic status), <b>OR</b> there is insufficient information provided about the appropriateness of comparison groups.</p>
--	<p><b>OHAT:</b>  <b>Cohort, Cross-Sectional:</b> There is direct evidence that subjects (both exposed and nonexposed) were not similar, recruited within very different time frames, or had very different participation/response rates.  <b>Case Control:</b> There is direct evidence that controls were drawn from a very dissimilar population than cases or recruited within very different time frames.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is direct evidence that subjects (both exposure groups and referent groups) were not similar (e.g., of similar geographic region, ethnicity, socioeconomic status).  <b>Additional Guidance:</b>  At least one known difference between the groups was not accounted for (e.g., the study authors acknowledged that the groups were different with respect to a variable that is a potential confounder not considered in the analysis), <b>OR</b> recruitment methods were very different (e.g., recruitment completed during different time frames, different criteria were used for recruitment).</p>

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Rating	Guidelines and clarifications
<b>4. Did the study design or analysis account for important confounding and modifying variables?</b>	
++	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial, Cohort, Cross-Sectional, Case Series/Report:</b> There is direct evidence that appropriate adjustments or explicit considerations were made for primary covariates and confounders in the final analyses through statistical models to reduce research-specific bias including standardization, case matching, adjustment in multivariate model, stratification, propensity scoring, or other methods were appropriately justified. Acceptable consideration of appropriate adjustment factors includes cases when the factor is not included in the final adjustment model because the author conducted analyses that indicated it did not need to be included.</p> <p><b>Case Control:</b> There is direct evidence that appropriate adjustments were made for primary covariates and confounders in the final analyses through statistical models to reduce research specific bias including standardization, matching of cases and controls, adjustment in multivariate model, stratification, propensity scoring, or other methods were appropriately justified.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is direct evidence that appropriate adjustments or explicit considerations were made for covariates and confounders in the final analyses through statistical models (e.g., standardization, multivariate adjustment). Acceptable consideration of appropriate adjustment factors includes cases when the factor is not included in the final adjustment model because the author conducted analyses that indicated it did not need to be included.</p> <p><b>Additional Guidance:</b></p> <p>Study adjusted for or addressed important potential confounders. Age, gender, education, and socioeconomic status are potential confounders that need to be addressed and considered in the study design or analyses. In addition, specific important confounders for this assessment depend on the health outcome and include smoking for lung cancer, sun exposure for skin lesions, and alcohol drinking for hepatic outcomes. Other confounders might also be judged important for certain health outcomes. A low risk-of-bias rating was assigned for this question if potential confounders deemed important were adequately addressed (e.g., distribution of variables was compared between groups, and there was no statistically significant difference).</p>
+	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that appropriate adjustments were made for most primary covariates and confounders, <b>OR</b> it is deemed that not considering or only considering a partial list of covariates or confounders in the final analyses would not appreciably bias results.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is indirect evidence that appropriate adjustments were made for most covariates and confounders, <b>OR</b> it is deemed that not considering or only considering a partial list of covariates or confounders in the final analyses would not appreciably bias results.</p> <p><b>Additional Guidance:</b></p> <p>Study adjusted only for some important potential confounders (e.g., sex and age), but it is likely that other confounders were present and not addressed (i.e., minimal number of confounders addressed).</p>

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Rating	Guidelines and clarifications
–	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that the distribution of primary covariates and known confounders differed between the groups and was not appropriately adjusted for in the final analyses, <b>OR</b> there is insufficient information provided about the distribution of known confounders.  <b>Case Control:</b> There is indirect evidence that the distribution of primary covariates and known confounders differed between cases and controls and was not investigated further, <b>OR</b> there is insufficient information provided about the distribution of known confounders in cases and controls.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is indirect evidence that the distribution of covariates and known confounders differed between the groups and was not appropriately adjusted for in the final analyses, <b>OR</b> there is insufficient information provided about the distribution of known confounders.  <b>Additional Guidance:</b>            Design or analysis did not adjust for important potential confounders. Adjustments were made for some potential confounders, but at least one major confounder was not addressed (e.g., no adjustment for smoking when evaluating lung cancer, no adjustment for sun exposure when evaluating skin cancer).</p>
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Cross-Sectional, Case Series/Report:</b> There is direct evidence that the distribution of primary covariates and known confounders differed between the groups, confounding was demonstrated, and was not appropriately adjusted for in the final analyses.  <b>Case Control:</b> There is direct evidence that the distribution of primary covariates and known confounders differed between cases and controls, confounding was demonstrated, but was not appropriately adjusted for in the final analyses.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT Human-Controlled Trial, Cohort, Cross-Sectional, and Case Series/Report criteria.  <b>Additional Guidance:</b>            None.</p>
<b>5. Did researchers adjust or control for other exposures that are anticipated to bias results?</b>	
++	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is direct evidence that other exposures anticipated to bias results were not present or were appropriately adjusted for.  <b>Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct evidence that other exposures anticipated to bias results were not present or were appropriately adjusted for. For occupational studies or studies of contaminated sites, other chemical exposures known to be associated with those settings were appropriately considered.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT Human-Controlled Trial criteria.  <b>Additional Guidance:</b>            Researchers adjusted for other chemicals or accounted for occupational exposures likely to be associated with the outcome.</p>

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Rating	Guidelines and clarifications
+	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that other coexposures anticipated to bias results were not present or were appropriately adjusted for, <b>OR</b> it is deemed that coexposures present would not appreciably bias results. Note, as discussed above, this includes insufficient information provided on coexposures in general population studies.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT criteria.</p> <p><b>Additional Guidance:</b>            No evidence that coexposures were addressed as confounders, but other specific chemicals or occupational exposures were addressed.</p>
-	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is indirect evidence that the control group may have received the treatment or there was an unbalanced provision of additional coexposures, which were not appropriately adjusted for.</p> <p><b>Cohort, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that there was an unbalanced provision of additional coexposures across the primary study groups, which were not appropriately adjusted for, <b>OR</b> there is insufficient information provided about coexposures in occupational studies or studies of contaminated sites where high exposures to other chemical exposures would have been reasonably anticipated.</p> <p><b>Case Control:</b> There is indirect evidence that there was an unbalanced provision of additional coexposures across cases and controls, which were not appropriately adjusted for, <b>OR</b> there is insufficient information provided about coexposures in occupational studies or studies of contaminated sites where high exposures to other chemical exposures would have been reasonably anticipated.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is indirect evidence that there was an unbalanced provision of additional coexposures, which were not appropriately adjusted for, <b>OR</b> there is insufficient information provided about coexposures in studies of contaminated sites where high exposures to other chemical exposures would have been reasonably anticipated.</p> <p><b>Additional Guidance:</b>            There is evidence that coexposures might not have been addressed. Examples include a study population with farmers and/or other types of workers but occupational coexposures (e.g., to pesticides) not addressed; or a study with known coexposures, but the relevance of the coexposure to arsenic effects is unknown, or it is not clear if other compounds were adjusted for in the analyses.</p>

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Rating	Guidelines and clarifications
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is direct evidence that the control group received the treatment or there was an unbalanced provision of additional coexposures, which were not appropriately adjusted for.  <b>Cohort, Cross-Sectional, Case Series/Report:</b> There is direct evidence that there was an unbalanced provision of additional coexposures across the primary study groups, which were not appropriately adjusted for.  <b>Case Control:</b> There is direct evidence that there was an unbalanced provision of additional coexposures across cases and controls, which were not appropriately adjusted for.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is direct evidence that there was an unbalanced provision of additional coexposures, which were not appropriately adjusted for.  <b>Additional Guidance:</b>            Known differential exposure to other chemical/pollutant also associated with the health outcome of interest occurred with arsenic, and exposure was not addressed by the study authors. An example is a study of copper smelter workers where the study authors either (a) list other chemicals likely to be associated with the health outcome that the subjects were exposed to, or (b) provide levels of the other compounds, <b>AND</b> there were statistically significant differences related to the arsenic exposure that were not addressed. Such differences might have resulted from differential exposure to another compound or arsenic; thus, it cannot be determined which exposure impacted the results.</p>
<b>6. Were experimental conditions identical across study groups?</b>	
NA	NA
<b>7. Did researchers adhere to the protocol?</b>	
++	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct evidence that there were no deviations from the protocol (i.e., the study report explicitly provides this level of detail).</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT criteria.  <b>Additional Guidance:</b>            None.</p>
+	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that there were no deviations from the protocol (i.e., authors did not report any deviations), <b>OR</b> deviations from the protocol are described and it is deemed that they would not appreciably bias results.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT criteria.  <b>Additional Guidance:</b>            Taking into consideration typical reporting practices, it seems unlikely that deviations from the protocol will be explicitly reported in most studies. Thus, unless stated otherwise by the authors (i.e., evidence of deviation is reported), or it is clear from the study report that deviations from the planned approach occurred, assume that no deviations occurred. It is anticipated that this approach will result in a rating of “probably low risk of bias” (+) for most studies. If there are deviations, the rating reflects how the deviations changed direction, magnitude, and/or significance of the results.</p>

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Rating	Guidelines and clarifications
–	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/report:</b> There is indirect evidence that there were large deviations from the protocol as outlined in the methods or study report.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT criteria.  <b>Additional Guidance:</b>  None.</p>
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct evidence that there were large deviations from the protocol as outlined in the methods or study report.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT criteria.  <b>Additional Guidance:</b>  None.</p>
<b>8. Were the research personnel and human subjects blinded to the study group during the study?</b>	
++	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is direct evidence that the subjects and research personnel were adequately blinded to study group, and it is unlikely that they could have broken the blinding during the study. Methods used to ensure blinding include central allocation, sequentially numbered drug containers of identical appearance; sequentially numbered, opaque, sealed envelopes; or equivalent methods.  <b>Assessment-Specific Clarification:</b>  None.</p>
+	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is indirect evidence that the research personnel and subjects were adequately blinded to study group, and it is unlikely that they could have broken the blinding during the study, <b>OR</b> it is deemed that lack of adequate blinding during the study would not appreciably bias results.  <b>Assessment-Specific Clarification:</b>  None.</p>
–	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is indirect evidence that it was possible for research personnel or subjects to infer the study group, <b>OR</b> there is insufficient information provided about blinding of the study group. Inadequate methods include using an open random allocation schedule (e.g., a list of random numbers), assignment envelopes used without appropriate safeguards (e.g., if envelopes were unsealed or nonopaque or not sequentially numbered), alternation, or rotation; date of birth; case record number; or any other explicitly unconcealed procedure. For example, if the use of assignment envelopes is described, but it remains unclear whether envelopes were sequentially numbered, opaque, and sealed.  <b>Assessment-Specific Clarification:</b>  None.</p>
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is direct evidence for lack of adequate blinding of the study group including no blinding or incomplete blinding of research personnel and subjects. For some treatments, such as behavioral interventions, allocation to study groups cannot be concealed.  <b>Assessment-Specific Clarification:</b>  None.</p>
<b>9. Were outcome data complete without attrition or exclusion from analysis?</b>	

*This document is a draft for review purposes only and does not constitute Agency policy.*

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Rating	Guidelines and clarifications
++	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial:</b> There is direct evidence that there was no loss of subjects during the study and outcome data were complete, <b>OR</b> loss of subjects (i.e., incomplete outcome data) was adequately addressed and reasons were documented when human subjects were removed from a study. Review authors should be confident that the participants included in the analysis are exactly those who were randomized into the trial. Acceptable handling of subject attrition includes: very little missing outcome data [less than 10% in each group; <a href="#">Genaidy et al. (2007)</a>]; reasons for missing subjects unlikely to be related to outcome (for survival data, censoring unlikely to be introducing bias); missing outcome data balanced in numbers across study groups, with similar reasons for missing data across groups, <b>OR</b> analyses (such as intention-to-treat analysis) in which missing data have been imputed using appropriate methods (ensuring that the characteristics of subjects lost to follow up or with unavailable records are described in an identical way and are not significantly different from those of the study participants). Note: Participants randomized but subsequently found not to be eligible need not always be considered as having missing outcome data (<a href="#">Higgins and Green, 2011</a>).</p> <p><b>Cohort:</b> There is direct evidence that loss of subjects (i.e., incomplete outcome data) was adequately addressed and reasons were documented when human subjects were removed from a study. Acceptable handling of subject attrition includes: very little missing outcome data; reasons for missing subjects unlikely to be related to outcome (for survival data, censoring unlikely to be introducing bias); missing outcome data balanced in numbers across study groups, with similar reasons for missing data across groups; <b>OR</b> missing data have been imputed using appropriate methods, <b>AND</b> characteristics of subjects lost to follow up or with unavailable records are described in an identical way and are not significantly different from those of the study participants.</p> <p><b>Case Control, Cross-Sectional:</b> There is direct evidence that exclusion of subjects from analyses was adequately addressed, and reasons were documented when subjects were removed from the study or excluded from analyses.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is direct evidence that there was no loss of subjects (e.g., due to moving or migration) or data during the study and outcome data were complete, <b>OR</b> incomplete outcome data were adequately addressed, <b>AND</b> characteristics of subjects lost to follow up or with unavailable records are described in an identical way and are not significantly different from those of the study participants.</p> <p><b>Additional Guidance:</b></p> <p>There are no reported data lost to attrition, and the numbers in the results tables sum to the total number of subjects, <b>OR</b> less than 10% of data are missing, <b>OR</b> there are some missing outcome data but study report clearly identifies missing data and how it was handled (e.g., loss to follow-up for a cohort study is determined to be minimal if there are some missing data for either the exposure or outcome for certain subjects at a specific time measured and the authors clearly explain what happened to everyone and which results were used in the analyses). For ecological studies specifically, there are no reported data lost to attrition, <b>OR</b> there are some missing data but study report clearly identifies missing data and how they were handled (e.g., migration in and out of study area and residence location within study area were tracked and accounted for or references provided to verify that population migration within or in/out of study area is not a concern for this population), and characteristics of subjects lost to attrition do not differ significantly from those included in study.</p>

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Rating	Guidelines and clarifications
+	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial:</b> There is indirect evidence that loss of subjects (i.e., incomplete outcome data) was adequately addressed and reasons were documented when human subjects were removed from a study, <b>OR</b> it is deemed that the proportion lost to follow-up would not appreciably bias results [less than 20% in each group; <a href="#">Genaidy et al. (2007)</a>]. This would include reports of no statistical differences in characteristics of subjects lost to follow up or with unavailable records from those of the study participants. Generally, the higher the ratio of participants with missing data to participants with events, the greater potential there is for bias. For studies with a long duration of follow-up, some withdrawals for such reasons are inevitable.</p> <p><b>Cohort:</b> There is indirect evidence that loss of subjects (i.e., incomplete outcome data) was adequately addressed and reasons were documented when human subjects were removed from a study, <b>OR</b> it is deemed that the proportion lost to follow-up would not appreciably bias results. This would include reports of no statistical differences in characteristics of subjects lost to follow-up or with unavailable records from those of the study participants. Generally, the higher the ratio of participants with missing data to participants with events, the greater potential there is for bias. For studies with a long duration of follow-up, some withdrawals for such reasons are inevitable.</p> <p><b>Case Control, Cross-Sectional:</b> There is indirect evidence that exclusion of subjects from analyses was adequately addressed, and reasons were documented when subjects were removed from the study or excluded from analyses.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is indirect evidence that there was no loss of subjects (e.g., due to migration during the study) and outcome data were complete, <b>OR</b> it is deemed that the proportion of subjects lost to follow-up would not appreciably bias results. This would include reports of no statistical differences in characteristics of subjects lost to follow-up or with unavailable records of outcomes. For studies with a long duration of follow-up, some withdrawals for such reasons are inevitable.</p> <p><b>Additional Guidance:</b> No direct evidence of loss to follow-up, attrition, or loss of subjects due to migration/moving provided. The tables of results do not include the number of subjects and it is not stated that there was any loss data missing; <b>OR</b> there appear to be no or very few missing data; <b>OR</b> in a cohort study, there is no mention of loss to follow-up.</p>
-	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial:</b> There is indirect evidence that loss of subjects (i.e., incomplete outcome data) was unacceptably large [greater than 20% in each group; <a href="#">Genaidy et al. (2007)</a>] and not adequately addressed, <b>OR</b> there is insufficient information provided about numbers of subjects lost to follow-up.</p> <p><b>Cohort:</b> There is indirect evidence that loss of subjects (i.e., incomplete outcome data) was unacceptably large and not adequately addressed, <b>OR</b> there is insufficient information provided about numbers of subjects lost to follow-up.</p> <p><b>Case Control, Cross-Sectional:</b> There is indirect evidence that exclusion of subjects from analyses was not adequately addressed, <b>OR</b> there is insufficient information provided about why subjects were removed from the study or excluded from analyses.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is indirect evidence that incomplete outcome data (e.g., due to subject migration or moving) were unacceptably large [greater than 20% in each group; <a href="#">Genaidy et al. (2007)</a>] and not adequately addressed, <b>OR</b> there is insufficient information provided about missing outcome data.</p> <p><b>Additional Guidance:</b> Missing outcome data with no explanation of why data were missing, and it is unclear from the characteristics table or other information provided in the report why the data might be missing.</p>

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Rating	Guidelines and clarifications
--	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial, Cohort:</b> There is direct evidence that loss of subjects (i.e., incomplete outcome data) was unacceptably large and not adequately addressed. Unacceptable handling of subject attrition includes reason for missing outcome data likely to be related to true outcome, with either imbalance in numbers or reasons for missing data across study groups; or potentially inappropriate application of imputation.</p> <p><b>Case Control, Cross-Sectional:</b> There is direct evidence that exclusion of subjects from analyses was not adequately addressed. Unacceptable handling of subject exclusion from analyses includes reason for exclusion likely to be related to true outcome, with either imbalance in numbers or reasons for exclusion across study groups.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is direct evidence that incomplete outcome data were unacceptably large and not adequately addressed, <b>OR</b> that characteristics of subjects lost to attrition were significantly different from those included in study.</p> <p><b>Additional Guidance:</b></p> <p>The missing outcome data are clearly related to exposure (more missing data for exposed compared to unexposed groups), but the study authors do not address why. For ecological studies, there is unacceptable handling of subject migration into and out of the study area or subject residence locations within study area.</p>
<b>10. Were the outcome assessors blinded to study group or exposure level?</b>	
++	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial:</b> There is direct evidence that the outcome assessors (including study subjects, if outcomes were self-reported) were adequately blinded to the study group, and it is unlikely that they could have broken the blinding prior to reporting outcomes.</p> <p><b>Cohort, Cross-Sectional, Case Series/Report:</b> There is direct evidence that the outcome assessors (including study subjects, if outcomes were self-reported) were adequately blinded to the exposure level, and it is unlikely that they could have broken the blinding prior to reporting outcomes.</p> <p><b>Case Control:</b> There is direct evidence that the outcome assessors (including study subjects, if outcomes were self-reported) were adequately blinded to the exposure level when reporting outcomes.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> Same as OHAT Cohort, Cross-Sectional, and Case Series/Report criteria.</p> <p><b>Additional Guidance:</b></p> <p>The study report states that outcome assessors were blinded to subjects' exposure levels, <b>OR</b> in a case-control study, researchers who assigned exposure levels based on drinking water level were blinded to the case/control status of the participant.</p>

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Rating	Guidelines and clarifications
+	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial:</b> There is indirect evidence that the outcome assessors (including study subjects, if outcomes were self-reported) were adequately blinded to the study group, and it is unlikely that they could have broken the blinding prior to reporting outcomes, <b>OR</b> it is deemed that lack of adequate blinding of outcome assessors would not appreciably bias results, which may vary by outcome (i.e., blinding is especially important for subjective measures).</p> <p><b>Cohort, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that the outcome assessors were adequately blinded to the exposure level, and it is unlikely that they could have broken the blinding prior to reporting outcomes, <b>OR</b> it is deemed that lack of adequate blinding of outcome assessors would not appreciably bias results (including that subjects self-reporting outcomes were likely not aware of reported links between the exposure and outcome lack of blinding is unlikely to bias a particular outcome).</p> <p><b>Case Control:</b> There is direct evidence that the outcome assessors were adequately blinded to the exposure level when reporting outcomes, <b>OR</b> it is deemed that lack of adequate blinding of outcome assessors would not appreciably bias results (including that subjects self-reporting outcomes were likely not aware of reported links between the exposure and outcome or lack of blinding is unlikely to bias a particular outcome).</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> Same as OHAT Human-Controlled Trial criteria.</p> <p><b>Additional Guidance:</b></p> <p>No direct statement that outcome assessors were blind, but it is likely that they were (e.g., pathologists conducting histopathology on the tissue would most likely be blind to the exposure status), <b>OR</b> outcomes were assessed using an automated instrument, making it unlikely that the results would be biased because automated instrument would not be biased.</p>
-	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial:</b> There is indirect evidence that it was possible for outcome assessors (including study subjects if outcomes were self-reported) to infer the study group prior to reporting outcomes, <b>OR</b> there is insufficient information provided about blinding of outcome assessors.</p> <p><b>Cohort, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that it was possible for outcome assessors to infer the exposure level prior to reporting outcomes (including that subjects self-reporting outcomes were likely aware of reported links between the exposure and outcome), <b>OR</b> there is insufficient information provided about blinding of outcome assessors.</p> <p><b>Case Control:</b> There is indirect evidence that it was possible for outcome assessors to infer the exposure level prior to reporting outcomes (including that subjects self-reporting outcomes were likely aware of reported links between the exposure and outcome), <b>OR</b> there is insufficient information provided about blinding of outcome assessors.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> Same as OHAT Case-Control criteria.</p> <p><b>Additional Guidance:</b></p> <p>Not enough information to determine if outcome assessors were blind to exposure status and the possibility exists that they could have knowledge (e.g., it is a cohort and exposure was assessed prior to outcome), <b>OR</b> likely that outcome assessors were aware of exposure, but not necessarily level of exposure (e.g., outcome was assessed in subject’s home, which is in either the control village or exposed village, but the study report evaluated different exposure levels in village so that when assessing the outcome, assessors would be aware that subjects were exposed or controls but not exact exposure level).</p>

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Rating	Guidelines and clarifications
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is direct evidence for lack of adequate blinding of outcome assessors (including study subjects if outcomes were self-reported), including no blinding or incomplete blinding.  <b>Cohort, Cross-Sectional, Case Series/Report:</b> There is direct evidence that outcome assessors were aware of the exposure level prior to reporting outcomes (including that subjects self-reporting outcomes were aware of reported links between the exposure and outcome).  <b>Case Control:</b> There is direct evidence that outcome assessors were aware of the exposure level prior to reporting outcomes (including that subjects self-reporting outcomes were aware of reported links between the exposure and outcome).  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT Case-Control criteria.  <b>Additional Guidance:</b>                      There is direct evidence that outcome assessor knew exposure status (e.g., same situation as above with outcome assessed in the village, but the report only evaluates exposure as “exposed vs. unexposed,” with no arsenic levels measured).</p>
<b>11. Were confounding variables assessed consistently across groups using valid and reliable measures?</b>	
++	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct evidence that primary covariates and confounders were assessed using valid and reliable measurements.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is direct evidence that group- or individual-level primary covariates and confounders were assessed using valid and reliable measurements.  <b>Additional Guidance:</b>                      Methods provide specific details on how confounders were measured (e.g., for body weight, details provided to indicate precision of measurement instrument and, ideally, calibration of instrument). Validated or pretested questionnaires used, and there was low potential for interviewer bias.</p>
+	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is indirect evidence primary covariates and confounders were assessed using valid and reliable measurements, <b>OR</b> it is deemed that the measures used would not appreciably bias results (i.e., the authors justified the validity of the measures from previously published research).  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is indirect evidence that group- or individual-level primary covariates and confounders were assessed using valid and reliable measurements, <b>OR</b> it is deemed that the measures used would not appreciably bias results (i.e., the authors justified the validity of the measures from previously published research).  <b>Additional Guidance:</b>                      Self-administered questionnaire, <b>OR</b> questionnaire administered by a single interviewer for all subjects (thus eliminating the possibility for interviewer agreement bias), <b>OR</b> methods for assessing confounders were mixed (e.g., some methods well conducted and consistent, but others may have been obtained from questionnaires not stated to be validated).</p>

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Rating	Guidelines and clarifications
–	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that primary covariates and confounders were assessed using measurements of unknown validity, <b>OR</b> there is insufficient information provided about the measures used.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is indirect evidence that group- and individual-level primary covariates and confounders were assessed using measurements of unknown validity, <b>OR</b> there is insufficient information provided about the measures used.</p> <p><b>Additional Guidance:</b>                      Not enough details were provided on how the confounders were assessed. Questionnaire used and administered by several interviewers with no details on validity/reliability of the questionnaire or on consistency between the interviewers.</p>
– –	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct evidence that primary covariates and confounders were assessed using nonvalid measurements.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is direct evidence that group- or individual-level primary covariates and confounders were not assessed using valid and reliable measures.</p> <p><b>Additional Guidance:</b>                      There is direct evidence of selective recall by disease status.</p>
<b>12. Can we be confident in the exposure characterization?</b>	

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Rating	Guidelines and clarifications
++	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial:</b> There is direct or indirect evidence that the test material is confirmed as ≥99% pure (or impurities have been characterized and not considered to be of serious concern), and that the concentration, stability, and homogeneity of stock material and formulation have been verified as appropriate (Note: ≥99% purity value is considered achievable based on current advertised purity from Sigma-Aldrich); <b>AND FOR INTERNAL DOSIMETRY STUDIES</b> there is direct evidence that most data points for the aglycone, conjugated and/or total bisphenol A (BPA) are <i>above</i> the LOQ for the assay; <b>AND</b> the study used spiked samples to confirm assay performance and the stability of BPA and conjugated BPA in biological samples was appropriately addressed; <b>AND</b> studies took measures to assess potential BPA contamination that might have occurred during sample collection and analysis, including method blanks. Note: Use of method blanks is necessary to identify potential sources of contamination in blood and urine but cannot rule out all possible sources of contamination (Ye et al., 2012). The risk of contamination for blood-based measurements is likely higher than for urinary measurements in part because sterile plastic blood collection containers can increase the number of sources of contamination and because of higher levels of protein and lipid levels in blood vs. urine. Preferred practices include (1) measurement of aglycone and conjugated or total BPA for blood measurements, and (2) use of isotopically labeled BPA dosing material (e.g., deuterated) to avoid issues of contamination, although we will not “downgrade” if a study did not follow these preferred practices.</p> <p><b>Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct evidence that most data points for the aglycone, conjugated and/or total BPA are <i>above</i> the LOQ for the assay; <b>AND</b> the study used spiked samples to confirm assay performance and the stability of BPA and conjugated BPA in biological samples was appropriately addressed; <b>AND</b> studies took measures to assess potential BPA contamination that might have occurred during sample collection and analysis including method blanks. Note: Use of method blanks is necessary to identify potential sources of contamination in blood and urine but cannot rule out all possible sources of contamination (Ye et al., 2012). The risk of contamination for blood-based measurements is likely higher than for urinary measurements in part because sterile plastic blood collection containers can increase the number of sources of contamination and because of higher levels of protein and lipid levels in blood vs. urine. Preferred practices include (1) measurement of aglycone and conjugated or total BPA for blood measurements, and (2) inclusion of multiple measurements of BPA because a single sample from an individual does not appear to be strong predictor of a subject’s exposure category. Mahalingaiah et al. (2008) analyzed samples from at least six repeat urinary BPA measurements from eight subjects. The sensitivity, specificity, and positive predictive value of a single urine sample to predict the highest BPA tertile were 0.64, 0.76, and 0.63, respectively. The positive predictive value increased to 0.85 when two samples were used to predict those individuals in the highest BPA tertile. Use of a single measurement in large sample size studies such as NHANES is less of an issue because the number of participants offsets potential concern for differential exposure misclassification. We will not downgrade if a study did not follow these preferred practices.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> This rating is not applicable. Only studies with individual-level exposure characterization can earn this rating. If individual-level exposure data are provided, the study is not an ecological study, and should be reclassified and rated according to other study type ROB criteria.</p> <p><b>Additional Guidance:</b></p> <p>Single spot urine samples are reported for many subjects (over 1,000), <b>OR</b> multiple (repeated) spot urine samples were reported. Individual-level drinking water levels (e.g., obtained from household tap or household well, but not village-level well) with methods well described, including reporting of LODs. Toenail and hair samples were cleaned, <b>AND</b> the recovery rate of the method or use of internal standards is reported. More than one arsenic exposure assessment (more than one matrix, and/or more than one measurement), and at least one of them is excellent (e.g., the large HEALS cohort and spot urine spot samples, in addition to village-level water arsenic measurements) and a correlation reported between the different measurements.</p>

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Rating	Guidelines and clarifications
+	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial:</b> There is direct or indirect evidence that purity was <math>\geq 98\%</math>, (or impurities have been characterized and not considered to be of serious concern, i.e., purity was independently confirmed by lab, purity is reported in paper or obtained through author query, or purity not reported but the source is listed and the supplier of the chemical provides documentation of the purity of the chemical; <b>AND FOR INTERNAL DOSIMETRY STUDIES</b>, there is indirect evidence that most data points for the aglycone, conjugated and/or total BPA are <i>above</i> the LOQ for the assay, i.e., the central estimate (median, mean, geometric mean) is <i>above</i> the LOQ but results for individual data values are not presented or the presentation of variance estimates does not permit assessment of whether most data points are likely <i>above</i> the LOQ; <b>AND</b> the study used spiked samples to confirm assay performance and the stability of BPA and conjugated BPA in biological samples was appropriately addressed; <b>AND</b> studies took measures to assess potential BPA contamination that might have occurred during sample collection and analysis including method blanks.</p> <p><b>Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that most data points for the aglycone, conjugated and/or total BPA are <i>above</i> the LOQ for the assay, i.e., the central estimate (median, mean, geometric mean) is <i>above</i> the LOQ but results for individual data values are not presented or the presentation of variance estimates do not permit assessment of whether most data points are likely <i>above</i> the LOQ; <b>AND</b> the study used spiked samples to confirm assay performance and the stability of BPA and conjugated BPA in biological samples has been appropriately addressed; <b>AND</b> studies took measures to assess potential BPA contamination that might have occurred during sample collection and analysis including method blanks; <b>OR</b> use of questionnaire items where results of biomonitoring studies support the use of the questionnaire item(s) as an indicator of relative level of exposure; <b>OR</b> job description for occupational studies where levels in the work environment or results of biomonitoring studies support the use of job description as an indicator of relative level of exposure.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is direct or indirect evidence that the exposure to the chemical of concern was adequately characterized by appropriate measures and methods (e.g., adequate monitoring over time of multiple sources per exposure group, cumulative exposures based on historical changes in measured exposures, exposure measures taken for a moderate proportion of population).</p> <p><b>Additional Guidance:</b></p> <p>Single spot urine samples with a moderate number of subjects (i.e., hundreds or more). Adequate measurements and methods, but limits of detection (LOD) are not provided. Exposure based on occupational title but supported by some arsenic monitoring (air, urine, or other biomarker). For ecological studies, drinking water levels were obtained from the smallest groups available (e.g., household or village level) with methods well described and monitoring over time to estimate cumulative exposure based on changes in arsenic concentrations, including reporting of LODs and residential durations.</p>

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Rating	Guidelines and clarifications
-	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> Neither the source nor purity of the chemical was reported in the study and information on purity could not be obtained through author query/vendor documentation; <b>AND FOR INTERNAL DOSIMETRY STUDIES</b>, there is direct or indirect evidence that most data points for the aglycone, conjugated, and/or total BPA are above the LOQ for the assay, <b>BUT</b> no steps were taken to assess potential BPA contamination that might have occurred during sample collection and analysis; <b>OR</b> there is indirect or direct evidence that most individual data points for the aglycone, conjugated, and/or total BPA are below the LOQ for the assay; <b>OR</b> method to measure BPA used ELISA, which is less accepted as providing quantitatively accurate values and because of potential uncharacterized antibody cross-reactivity with conjugates and endogenous components of sample matrices (<a href="#">Chapin et al., 2008</a>; <a href="#">Vandenberg et al., 2007</a>).</p> <p><b>Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct or indirect evidence that most data points for the aglycone, conjugated, and/or total BPA are above the LOQ for the assay, <b>BUT</b> no steps were taken to assess potential BPA contamination that might have occurred during sample collection and analysis; <b>OR</b> there is indirect or direct evidence that most individual data points for the aglycone, conjugated, and/or total BPA are below the LOQ for the assay; <b>OR</b> method to measure BPA used ELISA, which leads to concern because of uncharacterized antibody cross-reactivity with conjugates and endogenous components of sample matrices (<a href="#">Chapin et al., 2008</a>; <a href="#">Vandenberg et al., 2007</a>); <b>OR</b> use of questionnaire items that are not supported by results of biomonitoring studies; <b>OR</b> job description for occupational studies that are not supported by information on levels in the work environment or results of biomonitoring studies.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is indirect evidence that the chemical in question was not adequately characterized by appropriate measures and methods (e.g., no historical monitoring, isolated or remote-time samples taken to be representative of large areas, no cumulative exposures estimated).  <b>Additional Guidance:</b>  Exposure based on single spot urine sample for a limited number of subjects (less than 100), <b>OR</b> exposure based on occupational title with no arsenic monitoring, <b>OR</b> cumulative arsenic levels based on self-reported duration/resident history and group well-water measurements.</p>
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial:</b> There is indirect or direct evidence that purity was &lt;98%; <b>AND FOR INTERNAL DOSIMETRY STUDIES</b>, there is direct evidence of uncontrolled contamination.  <b>Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct evidence of uncontrolled contamination, <b>OR</b> not reporting of methods used to assess exposure and this information could not be obtained through author query, <b>OR</b> self-report exposure.</p> <p><b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is direct evidence that the chemical in question was not adequately characterized by appropriate measures and methods (e.g., no historical monitoring, isolated or remote-time samples taken to be representative of large areas, no cumulative exposures estimated), <b>OR</b> there is direct evidence of uncontrolled contamination, <b>OR</b> methods used to assess exposure not reported, <b>OR</b> self-reported exposure.  <b>Additional Guidance:</b>  No measured arsenic concentrations. Exposure assessed based on presence/absence of skin lesions, <b>OR</b> self-reported duration of drinking water or living in a certain area, <b>OR</b> lifetime cumulative arsenic exposure determined using self-reported information on residential history and drinking-water daily consumption rates, and village-level median arsenic concentration in drinking water.</p>

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Rating	Guidelines and clarifications
<b>13. Can we be confident in the outcome assessment?</b>	
++	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial, Cohort:</b> There is direct evidence that the outcome was assessed using well-established methods, the “gold standard,” or with validity and reliability &gt;0.70 (<a href="#">Genaidy et al., 2007</a>), and subjects had been followed for the same length of time in all study groups. Acceptable assessment methods will depend on the outcome, but examples of such methods may include: objectively measured with diagnostic methods, measured by trained interviewers, obtained from registries (<a href="#">Shamliyan et al., 2010</a>).</p> <p><b>Case Control:</b> There is direct evidence that the outcome was assessed in cases using well-established methods (the gold standard) and subjects had been followed for the same length of time in all study groups.</p> <p><b>Cross-Sectional, Case Series/Report:</b> There is direct evidence that the outcome was assessed using well-established methods (the gold standard).</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is direct evidence that the outcome was assessed using well-established methods, the gold standard (e.g., individual-level outcome data were assessed, as in the case of semi-individual ecological studies), and subjects have been followed for the same length of time in all study groups. Acceptable assessment methods will depend on the outcome, but examples of such methods may include: objectively measured with diagnostic methods, measured by trained interviewers, obtained from reliable registries or records.</p> <p><b>Additional Guidance:</b> Cancer cases are histologically confirmed, <b>OR</b> data obtained from nationwide registry are accepted as valid and complete (e.g., Taiwan), <b>OR</b> outcome diagnosed by physician, <b>OR</b> outcome obtained from medical record data or validated with such data (if self-reported).</p>

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Rating	Guidelines and clarifications
+	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial, Cohort:</b> There is indirect evidence that the outcome was assessed using acceptable methods [i.e., deemed valid and reliable but not the gold standard or with validity and reliability <math>\geq 0.40</math>; <a href="#">Genaidy et al. (2007)</a>] and subjects had been followed for the same length of time in all study groups, <b>OR</b> it is deemed that the outcome assessment methods used would not appreciably bias results. Acceptable, but not ideal assessment methods will depend on the outcome, but examples of such methods may include proxy reporting of outcomes and mining of data collected for other purposes.</p> <p><b>Case Control:</b> There is indirect evidence that the outcome was assessed in cases (i.e., case definition) using acceptable methods and subjects had been followed for the same length of time in all study groups, <b>OR</b> it is deemed that the outcome assessment methods used would not appreciably bias results.</p> <p><b>Cross-Sectional, Case Series/Report:</b> There is indirect evidence that the outcome was assessed using acceptable methods, <b>OR</b> it is deemed that the outcome assessment methods used would not appreciably bias results.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is indirect evidence that the outcome was assessed using acceptable methods (i.e., deemed valid and reliable but not the gold standard) and subjects had been followed for the same length of time in all study groups, <b>OR</b> it is deemed that the outcome assessment methods used would not appreciably bias results, <b>OR</b> group-level outcomes were assessed using well-established methods. Acceptable, but not ideal assessment methods will depend on the outcome, but examples of such methods may include proxy reporting of outcomes and mining of data collected for other purposes.</p> <p><b>Additional Guidance:</b></p> <p>Death certificates are used, but there is no statement that they were coded by certified nosologist, <b>OR</b> information on the accuracy/validity/completeness of the death certificates is missing, <b>OR</b> incident cancer cases are not stated to be histologically confirmed, but the study was conducted in a hospital setting (e.g., hospital-based case-control study).</p>
–	<p><b>OHAT:</b></p> <p><b>Human-Controlled Trial, Cohort:</b> There is indirect evidence that the outcome assessment method is an insensitive instrument, the authors did not validate the methods used, or the length of follow up differed by study group, <b>OR</b> there is insufficient information provided about validation of outcome assessment method.</p> <p><b>Case Control:</b> There is indirect evidence that the outcome was assessed in cases using an insensitive instrument or was not adequately validated, <b>OR</b> there is insufficient information provided about how cases were identified.</p> <p><b>Cross-Sectional, Case Series/Report:</b> There is indirect evidence that the outcome assessment method is an insensitive instrument or was not adequately validated, <b>OR</b> there is insufficient information provided about validation of outcome assessment method.</p> <p><b>Assessment-Specific Clarification:</b></p> <p><b>Ecological and Semi-individual:</b> There is indirect evidence that the authors did not validate the methods used, or the length of follow-up differed by study group, <b>OR</b> there is insufficient information provided about validation of outcome assessment method.</p> <p><b>Additional Guidance:</b></p> <p>Outcome is self-reported (e.g., “ever been diagnosed by a physician”) and not verified by medical records or other means. There is insufficient information on quality of self-report or validation of answers.</p> <p>Outcome is assessed by nurses and there is no information on assessor agreement.</p>

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Rating	Guidelines and clarifications
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort:</b> There is direct evidence that the outcome assessment method is an insensitive instrument, or the length of follow-up differed by study group.  <b>Case Control:</b> There is direct evidence that the outcome was assessed in cases using an insensitive instrument.  <b>Cross-Sectional, Case Series/Report:</b> There is direct evidence that the outcome assessment method is an insensitive instrument.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> There is direct evidence that the authors did not validate the methods used, or the length of follow-up differed by study group.  <b>Additional Guidance:</b>                      Self-reported outcome when question is not worded “as diagnosed by a physician” and cannot be verified.</p>
<b>14. Were all measured outcomes reported?</b>	
++	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct evidence that all the study’s measured outcomes (primary and secondary) outlined in the protocol, methods, abstract, and/or introduction (that are relevant for the evaluation) have been reported. This would include outcomes reported with sufficient detail to be included in meta-analysis or fully tabulated during data extraction.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT criteria.  <b>Additional Guidance:</b>                      None.</p>
+	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that all of the study’s measured outcomes (primary and secondary) outlined in the protocol, methods, abstract, and/or introduction (that are relevant for the evaluation) have been reported, <b>OR</b> analyses that had not been planned at the outset of the study (i.e., retrospective unplanned subgroup analyses) are clearly indicated as such, and it is deemed that the omitted analyses were not appropriate and selective reporting would not appreciably bias results. This would include outcomes reported with insufficient detail such as only reporting that results were statistically significant (or not).  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT criteria.  <b>Additional Guidance:</b>                      All outcomes outlined in abstract, introduction, and methods are reported.</p>
-	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is indirect evidence that all of the study’s measured outcomes (primary and secondary) outlined in the protocol, methods, abstract, and/or introduction (that are relevant for the evaluation) have been reported, <b>OR</b> there is insufficient information provided about selective outcome reporting.  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT criteria.  <b>Additional Guidance:</b>                      An outcome mentioned in a part of the study report is obviously missing from the results.</p>

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Rating	Guidelines and clarifications
--	<p><b>OHAT:</b>  <b>Human-Controlled Trial, Cohort, Case Control, Cross-Sectional, Case Series/Report:</b> There is direct evidence that all of the study's measured outcomes (primary and secondary) outlined in the protocol, methods, abstract, and/or introduction (that are relevant for the evaluation) have not been reported. In addition to not reporting outcomes, this would include reporting outcomes based on composite score without individual outcome components or outcomes reported using measurements, analysis methods or subsets of the data (e.g., subscales) that were not prespecified or reporting outcomes not prespecified (unless clear justification for their reporting is provided, such as an unexpected effect).  <b>Assessment-Specific Clarification:</b>  <b>Ecological and Semi-individual:</b> Same as OHAT criteria.  <b>Additional Guidance:</b>                      None.</p>
<b>15. Were there no other potential threats to internal validity (e.g., statistical methods were appropriate)?</b>	
	<p><b>OHAT:</b>                      On a project-specific basis, additional questions for other potential threats to internal validity can be added and applied to study designs as appropriate.</p>
++	<p><b>Assessment-Specific Clarification:</b>                      Statistical analyses were appropriate and no other threats to internal validity were identified. Study authors might acknowledge limitations, but these are not expected to affect the study's internal validity.</p>
+	<p><b>Assessment-Specific Clarification:</b>                      There are study limitations likely to bias the results toward or away from the null, but adequate sample size was available in each cell (<math>n \geq 5</math>), <b>OR</b> sample size is small and acknowledged as a potential limitation by study authors, but significant results were still observed.</p>
-	<p><b>Assessment-Specific Clarification:</b>                      There are study limitations likely to bias results towards or away from the null, <b>OR</b> analyses were conducted on a small number of subjects (<math>n &lt; 5</math> in any given cell) and no statistically significant results were observed.</p>
--	<p><b>Assessment-Specific Clarification:</b>                      None.</p>

LOD = limit of detection; LOQ = level of quantitation; OHAT = Office of Health Assessment and Translation.

## APPENDIX D. TYPICAL DATA ABSTRACTION FIELDS

**Table D-1. Key data extraction elements to summarize study design, methodology, and results**

Data abstraction field	Data extraction elements
<b>HUMAN</b>	
<b>Funding</b>	Funding source(s)
	Reporting of conflict of interest by authors
<b>Subjects</b>	Study population name/description
	Dates of study and sampling time frame
	Geography (country, region, state, etc.)
	Demographics (sex, race/ethnicity, age, or life stage at exposure and at outcome assessment)
	Number of subjects (target, enrolled, <i>n</i> per group in analysis, and participation/follow-up rates)
	Inclusion/exclusion criteria/recruitment strategy
	Description of reference group
<b>Methods</b>	Study design (e.g., prospective or retrospective cohort, nested case-control study, cross-sectional, population-based case-control study, intervention, case report, etc.)
	Length of follow-up
	Health outcome category (e.g., cardiovascular)
	Health outcome (e.g., blood pressure)
	Diagnostic or methods used to measure health outcome
	Confounders or modifying factors and how considered in analysis (e.g., included in final model, considered for inclusion but determined not needed)
	Chemical name and CAS number
	Exposure assessment (e.g., blood, urine, hair, air, drinking water, job classification, residence, administered treatment in controlled study, etc.)
	Methodological details for exposure assessment (e.g., HPLC-MS/MS, limit of detection)
	Statistical methods
<b>Results</b>	Exposure levels (e.g., mean, median, measures of variance as presented in paper, such as standard deviation [SD], SEM, 75 <sup>th</sup> /90 <sup>th</sup> /95 <sup>th</sup> percentile, minimum/maximum); range of exposure levels, number of exposed cases

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<b>Data abstraction field</b>	<b>Data extraction elements</b>
	<p>Statistical findings (e.g., adjusted <math>\beta</math>, standardized mean difference, adjusted odds ratio, standardized mortality ratio, relative risk, etc.) or description of qualitative results. When possible, convert measures of effect to a common metric with associated 95% confidence intervals. Most often, measures of effect for continuous data are expressed as mean difference, standardized mean difference, and percentage control response. Categorical data are typically expressed as odds ratio, relative risk (RR, also called risk ratio), or <math>\beta</math> values, depending on what metric is most commonly reported in the included studies and ability to obtain information for effect conversions from the study or through author query.</p> <p>Observations on dose-response (e.g., trend analysis, description of whether dose-response shape appears to be monotonic, nonmonotonic)</p>
<b>Other</b>	Documentation of author queries, use of digital rulers to estimate data values from figures, exposure unit, and statistical result conversions, etc.

HPLC-MS/MS = high-performance liquid chromatography with mass spectrometry detection; SEM = standard error of the mean.

## APPENDIX E. EVALUATION OF PHYSIOLOGICALLY BASED PHARMACOKINETIC MODELS

### A.4. MODEL CHOICE

1            This appendix evaluates previously published physiologically based pharmacokinetic  
2 (PBPK) models for arsenic (As) (see Table E-1). Computational code for all published models was  
3 requested from the respective authors, but was obtained only for the rabbit and hamster model of  
4 [Mann et al. \(1996a\)](#), the mouse and rat model of [Gentry et al. \(2004\)](#), and two human models ([El-](#)  
5 [Masri and Kenyon, 2008](#); [Lee, 1999](#)). All these models were written in the acsl programming  
6 language, but in different software versions or for different platforms. The model code of [Mann et](#)  
7 [al. \(1996a\)](#) was written in Simulsolv Version 2.1 (Dow Chemical Co.), and that of [Gentry et al.](#)  
8 [\(2004\)](#) was adapted from [Mann et al. \(1996a\)](#). The model of [Lee \(1999\)](#) was written in acsl Tox (no  
9 specifications related to the version were found in the thesis), and the one by [El-Masri and Kenyon](#)  
10 [\(2008\)](#) was written with acslX. Any model selected for use would need to be converted to a  
11 currently available platform. A combination of R (for model scripts) and MCSim (for the core model  
12 code) is currently being used for other PBPK models and would be the first choice for this  
13 assessment because both platforms are open source and freely available. [Liao et al. \(2008\)](#) (human  
14 child model) contains an appendix with a relatively good description of the equations, but the code  
15 would need to be built based on these equations and tested to verify the results match those in the  
16 paper.

17            Since 1996 when Mann et al. created their hamster and rabbit PBPK model, marked  
18 improvements in the biological description of arsenic absorption, distribution, metabolism, and  
19 excretion (ADME) processes have occurred.. [El-Masri and Kenyon \(2008\)](#) used newer and more  
20 relevant experimental data. The biological relevance of the parameters used in the newer models  
21 has also increased so that this appendix does not need to address changes in the way parameter  
22 optimization or fitting was conducted. The greater biological relevance increases the confidence in  
23 the most recent model ([El-Masri and Kenyon, 2008](#)).

**Table E-1. Models code information<sup>a</sup>**

References	Model code (software)	Comments
<a href="#">Mann et al. (1996a)</a>	Simulsolv Version 2.1 (Dow Chemical Co.)	Adaptation needed
<a href="#">Lee (1999)</a>	acsl Tox (see the Appendix)	Adaptation needed
<a href="#">Liao et al. (2008)</a>	MATLAB from MathWorks	Adaptation needed
<a href="#">Gentry et al. (2004)</a>	Probably acsl, but an old version	Adaptation needed
<a href="#">El-Masri and Kenyon (2008)</a>	acslX (recent version)	Ready to evaluate in acslX

<sup>a</sup>All models would require adaptation to R/MCSim or another currently available platform for use.

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## **A.5. [EL-MASRI AND KENYON \(2008\)](#) (HUMAN MODEL)**

1           The [El-Masri and Kenyon \(2008\)](#) PBPK model for As was developed for human adults and  
2 incorporates all the different forms of As. These include As(III), As(V), monomethylarsonate  
3 (MMA[III]), MMA(V), dimethylarsinate (DMA[III]), and DMA[V], although MMA(III) and DMA(III)  
4 are only described in the liver, lung, and kidney, with urinary excretion of MMA(III) and DMA(III)  
5 treated as occurring directly from those tissues. This model has eight compartments with  
6 flow-limited distribution: lung, liver, gastrointestinal (GI) tract (lumen and tissue), kidney, muscle,  
7 brain, skin, and heart (see Figure E-1). The physiological parameters came from [Brown et al.](#)  
8 [\(1997\)](#). As(III), As(V), MMA(V), and DMA(V) are distributed in the systemic circulation  
9 simultaneously. While the model has lung and skin compartments, it is only coded and  
10 parameterized for oral absorption. Oral absorption and urinary elimination are described as  
11 first-order processes. Partition coefficients (PCs) were estimated from [Benramdane et al. \(1999\)](#)  
12 and [Saady et al. \(1989\)](#) for each form of circulating As. Total As levels in blood compared  
13 with tissues, as reported by [Saady et al. \(1989\)](#), were considered accurate. [Benramdane et al.](#)  
14 [\(1999\)](#) reported the fraction as As(III), As(V), MMA, and DMA, but samples were taken 3 days  
15 postmortem and the blood:tissue ratios were not considered reliable. For this reason, [El-Masri and](#)  
16 [Kenyon \(2008\)](#) used the ratios of As species from [Benramdane et al. \(1999\)](#) together with the total  
17 blood:tissue ratios from [Saady et al. \(1989\)](#) to estimate blood:tissue PCs for each form. The authors  
18 conclude that the resulting PCs are relatively similar to those used by [Yu \(1999a\)](#).

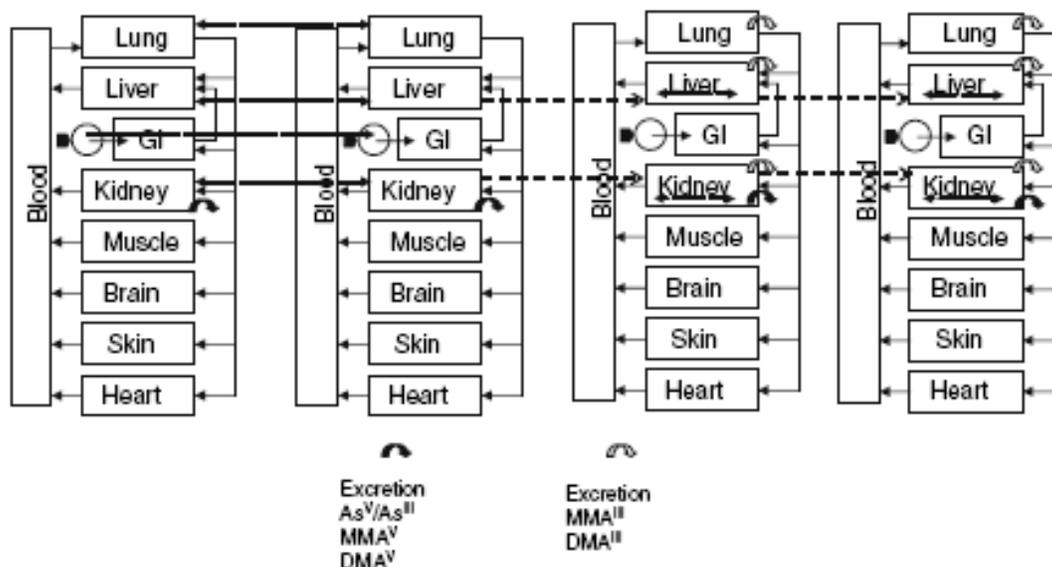


Figure E-1. Conceptual representation of physiologically based pharmacokinetic (PBPK) model.

Source: [El-Masri and Kenyon \(2008\)](#).

- 1 For the metabolites, the authors suggest inhibitory effects of As(III) on the methylation of
- 2 MMA(III) to DMA(V) and of MMA(III) on the methylation of As(III) to MMA(V), which were modeled
- 3 as noncompetitive inhibition (see Figure E-2).

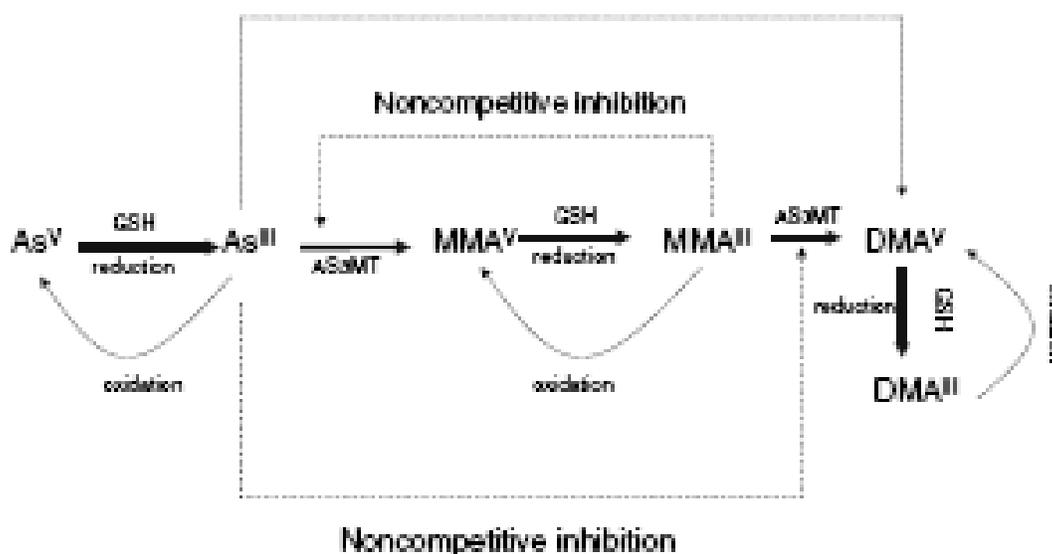


Figure E-2. Metabolism pathways describe in the literature.

Source: [El-Masri and Kenyon \(2008\)](#).

1 A Simulink platform was used for the simulation; MATLAB® was used for the optimization.  
2 The PBPK model was evaluated against available data in the literature ([Lee, 1999](#); [Buchet et al.,  
3 1981a, b](#)). Overall, the evaluation of the model showed a better prediction at a low dose than at a  
4 high dose. The advantages of using the [El-Masri and Kenyon \(2008\)](#) model for risk assessment are  
5 as follows:

- 6 • This model was peer reviewed.
- 7 • This model is the most recent one published, implying it may have incorporated the most  
8 recent literature values available.
- 9 • Most of the metabolic constants used in this model were determined experimentally or  
10 were optimized from urinary excretion data following exposures to inorganic As, MMA only,  
11 and DMA only.
- 12 • Model performance was assessed using predictors analysis such as mean absolute  
13 performance error (MAPE%) and root-media-square performance error (RMSPE%).

14 Minor concerns for the [El-Masri and Kenyon \(2008\)](#) model for risk assessment are as  
15 follows:

- 16 • A systematic sensitivity and uncertainty analysis is needed for each parameter.
- 17 • The independent variable for time should be converted from minutes to days or weeks to  
18 facilitate lifetime exposure analysis.
- 19 • Currently, the tissue compartment volumes are constants. To facilitate modeling of lifetime  
20 exposures, the tissue volumes should be re-expressed as a body-weight fraction. This  
21 conversion is essential because tissue volume and blood flows change with age.

22 A possibly significant issue of the model is that MMA(III) and DMA(III) are not described  
23 outside of the lung, liver, and kidney, which is a deficiency if concentrations for these metabolites in  
24 other tissues are important in the risk assessment.

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## **A.6. ANALYSIS OF [EL-MASRI AND KENYON \(2008\)](#)**

25 Considering the advantages and disadvantages of the [El-Masri and Kenyon \(2008\)](#) model as  
26 described above, this section further investigates details of this model and provides additional  
27 discussion of its appropriate application. Specifically, a table of the parameter values is provided  
28 with a discussion of the appropriateness of the selection of values compared with other available  
29 parameter values in the literature. We also describe additional data sets that have become

1 available since the publication of the paper in 2008 that could be used to modify some of the [El-](#)  
2 [Masri and Kenyon \(2008\)](#) parameters (specifically, the Michaelis constant [Km] values).

### **A.6.1. Parameter Values**

3 Table E-2 lists the constants used in the manuscript. (Note: the table does not include any  
4 calculated parameters.) This section discusses some of the key parameters and places the values  
5 used in this model into context with other available values in the literature.

### **A.6.2. Comparison of [El-Masri and Kenyon \(2008\)](#) Parameter Values to Other Models**

6 Table E-3 compares the binding affinity constants (Km values) and the maximum velocities  
7 ( $V_{\max}$  values) used by [El-Masri and Kenyon \(2008\)](#) with those used in other models [from [Yu](#)  
8 [\(1999a\)](#)]. [El-Masri and Kenyon \(2008\)](#) used Km values published in the literature ([Zakharyan et al.](#)  
9 [1999](#)). [Zakharyan et al. \(1999\)](#) used partially purified Chang human hepatocytes grown in culture  
10 and purified hepatocytes from rabbit to determine the Km and the  $V_{\max}$  of the methyltransferase.  
11 They also assumed that the activity of arsenite methyltransferase and the MMA methyltransferase  
12 appears in the same protein but in different active centers ([Zakharyan et al., 1999](#)). Because the  
13 rabbit and Chang human hepatocyte Km's were comparable, El-Masri and Kenyon decided to use  
14 the value of the Chang human hepatocytes as the Km ( $3 \times 10^{-6}$  M) value for their PBPK model and  
15 apply it to the equations for the conversion of MMA(III)  $\rightarrow$  DMA(V); As(III)  $\rightarrow$  MMA(V); and  
16 As(III)  $\rightarrow$  DMA(V). [Zakharyan et al. \(1999\)](#) determined an in vitro  $V_{\max}$  corresponding to the  
17 maximum velocity. The same authors also showed that MMA(III) is a noncompetitive inhibitor of  
18 arsenite methyltransferase and that inorganic arsenite is a noncompetitive inhibitor of MMA(III)  
19 methyltransferase. A noncompetitive inhibitor binds to a site on the enzyme that is not the active  
20 site. The enzyme undergoes a conformational change so that product formation is inhibited. In  
21 each case, the inhibitor does not act by binding to the same active site as the respective substrates.  
22 Nevertheless, it was not possible to use the  $V_{\max}$  determined by [Zakharyan et al. \(1999\)](#) because, to  
23 perform the extrapolation from in vitro to in vivo, one needs to know how much enzyme protein is  
24 in the PBPK model compartment (i.e., organ) and that information is not currently available.  
25 Therefore, [El-Masri and Kenyon \(2008\)](#) used a human data set from [Buchet et al. \(1981a\)](#) to  
26 estimate the  $V_{\max}$ .

**Table E-2. Constant list that appeared in the model code file used in the manuscript**

<b>Name</b>	<b>Value</b>	<b>Units</b>	<b>Descriptions of parameters</b>
KA_AS3	0.004	min <sup>-1</sup>	Oral absorption constant of As(III)
KA_AS5	0.003	min <sup>-1</sup>	Oral absorption constant of As(V)
KA_DMA	0.007	min <sup>-1</sup>	Oral absorption constant of DMA(V)
KA_MMA	0.007	min <sup>-1</sup>	Oral absorption constant of MMA(V)
KAS3_DMA_K	3.00 × 10 <sup>-6</sup>	mol/L	Km of As(III) for its metabolism to DMA in kidney
KAS3_DMA_LI	3.00 × 10 <sup>-6</sup>	mol/L	Km of As(III) for its metabolism to DMA in liver
KAS3_MMA_K	3.00 × 10 <sup>-6</sup>	mol/L	Km of As(III) for its metabolism to MMA in kidney
KAS3_MMA_LI	3.00 × 10 <sup>-6</sup>	mol/L	Km of As(III) for its metabolism to MMA in liver
KI_AS3	4.00 × 10 <sup>-5</sup>	mol/L	Noncompetitive inhibition constant Ki of As(III)
KI_MMA	4.00 × 10 <sup>-5</sup>	mol/L	Noncompetitive inhibition constant Ki of MMA(III)
KMMA_DMA	3.00 × 10 <sup>-6</sup>	mol/L	Km of MMA(III) for its metabolism to DMA
KOX_AS	0.25	unitless	Oxidation of As(III)
KOX_DMA	0.65	unitless	Oxidation of DMA(III)
KOX_MMA	0.63	unitless	Oxidation of MMA(III)
KRED_AS	0.0025	min <sup>-1</sup>	Reduction of As(V)
KRED_DMA	0.004	min <sup>-1</sup>	Reduction of DMA(V)
KRED_MMA	0.0075	min <sup>-1</sup>	Reduction of MMA(V)
KUR_AS	0.07	min <sup>-1</sup>	Urine excretion constant of As(III) and As(V)
KUR_DMA	0.13	min <sup>-1</sup>	Urine excretion constant of DMA (both forms)
KUR_MMA	0.2788	min <sup>-1</sup>	Urine excretion constant of MMA (both forms)
PB_AS3	2.35	unitless	Partition coefficient brain/blood for As(III)
PB_AS5	2.4	unitless	Partition coefficient brain/blood for As(V)
PB_DMA	3.3	unitless	Partition coefficient brain/blood for DMA (both forms)
PB_MMA	2.2	unitless	Partition coefficient brain/blood for MMA (both forms)
PG_AS3	8.3	unitless	Partition coefficient GI tract/blood for As(III)
PG_AS5	2.7	unitless	Partition coefficient GI tract/blood for As(V)
PG_DMA	2.1	unitless	Partition coefficient GI tract/blood for DMA (both forms)
PG_MMA	2.2	unitless	Partition coefficient GI tract/blood for MMA (both forms)
PH_AS3	7.4	unitless	Partition coefficient heart/blood for As(III)
PH_AS5	7.9	unitless	Partition coefficient heart/blood for As(V)

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<b>Name</b>	<b>Value</b>	<b>Units</b>	<b>Descriptions of parameters</b>
PH_DMA	2.4	unitless	Partition coefficient heart/blood for DMA (both forms)
PH_MMA	2.61	unitless	Partition coefficient heart/blood for MMA (both forms)
PK_AS3	11.7	unitless	Partition coefficient kidney/blood for As(III)
PK_AS5	8.3	unitless	Partition coefficient kidney/blood for As(V)
PK_DMA	3.8	unitless	Partition coefficient kidney/blood for DMA (both forms)
K_MMA	4.4	unitless	Partition coefficient kidney/blood for MMA (both forms)
PLI_AS3	16.5	unitless	Partition coefficient liver/blood for As(III)
PLI_AS5	15.8	unitless	Partition coefficient liver/blood for As(V)
PLI_DMA	3.3	unitless	Partition coefficient liver/blood for DMA (both forms)
PLI_MMA	3.3	unitless	Partition coefficient lungs/blood for MMA (both forms)
PLU_AS3	6.7	unitless	Partition coefficient lungs/blood for As(III)
PLU_AS5	2.1	unitless	Partition coefficient lungs/blood for As(V)
PLU_DMA	1.3	unitless	Partition coefficient lungs/blood for DMA (both forms)
PLU_MMA	1.3	unitless	Partition coefficient lungs/blood for MMA (both forms)
PM_AS3	7.4	unitless	Partition coefficient muscles/blood for As(III)
PM_AS5	7.9	unitless	Partition coefficient muscles/blood for As(V)
PM_DMA	2.4	unitless	Partition coefficient muscles/blood for DMA (both forms)
PM_MMA	2.61	unitless	Partition coefficient muscles/blood for MMA (both forms)
PS_AS3	7.4	unitless	Partition coefficient skin/blood for As(III)
PS_AS5	7.9	unitless	Partition coefficient skin/blood for As(V)
PS_DMA	2.4	unitless	Partition coefficient skin/blood for DMA (both forms)
PS_MMA	2.61	unitless	Partition coefficient skin/blood for MMA (both forms)
QC	5.2	L/min	Cardiac output
QB	0.63	L/min	Brain blood flow
QH	0.2	L/min	Heart tissue blood flow
QHE	0.31	L/min	Hepatic artery blood flow (~25% of total liver flow)
QK	1	L/min	Kidney blood flow
QLI	1.31	L/min	Total liver blood flow (QHE + QPV)
QM	1.8	L/min	Muscle blood flow
QPV	1	L/min	Portal vein blood flow (~75% of total liver flow)
QS	0.26	L/min	Skin blood flow
VAS3_DMA_K	$2.00 \times 10^{-6}$	mol/min	$V_{max}$ for methylation of As(III) to DMA(V) in kidney

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Name	Value	Units	Descriptions of parameters
VAS3_DMA_LI	$2.00 \times 10^{-6}$	mol/min	$V_{max}$ for methylation of As(III) to DMA in liver
VAS3_MMA_K	$5.30 \times 10^{-7}$	mol/min	$V_{max}$ for methylation of As(III) to MMA in kidney
VAS3_MMA_LI	$5.30 \times 10^{-7}$	mol/min	$V_{max}$ for methylation of As(III) to MMA in liver
VMMA_DMA	$6.60 \times 10^{-7}$	mol/min	$V_{max}$ for methylation of MMA(III) to DMA(V)
VB	1.4	L	Brain volume
VG	1.2	L	GI tract volume
VH	0.35	L	Heart volume
VK	0.28	L	Kidney volume
VLI	1.82	L	Liver volume
VLU	0.56	L	Lung volume
VM	55.5	L	Muscle volume
VS	2.6	L	Skin volume

**Table E-3. Comparison of Km and maximum velocity ( $V_{max}$ )**

Parameter	<a href="#">El-Masri and Kenyon (2008)</a>	<a href="#">Yu (1999b)</a>
<b>Methylation of MMA</b>		
$V_{max}$ (MMA[III] → DMA)	$6.6 \times 10^{-7}$ mol/min	$2.67 \times 10^{-7}$ mol/min
Km (MMA[III] → DMA)	$3 \times 10^{-6}$ M	$1 \times 10^{-4}$ M
Kinh (noncompetitive inhibition)	$4 \times 10^{-5}$ M	NA
<b>Methylation of As</b>		
$V_{max}$ (As[III] → MMA)	$5.3 \times 10^{-7}$ mol/min	$1.875 \times 10^{-7}$ mol/min
Km (As[III] → MMA)	$3 \times 10^{-6}$ M	$1 \times 10^{-4}$ M
$V_{max}$ (As[III] → DMA)	$2 \times 10^{-6}$ mol/min	$3.708 \times 10^{-7}$ mol/min
Km (As[III] → DMA)	$3 \times 10^{-6}$ M	$1 \times 10^{-4}$ M
Kinh (noncompetitive inhibition)	$4 \times 10^{-5}$ M	NA

NA = not applicable.

- 1 The parameters found in the [Yu \(1999a\)](#) PBPK model either came from the literature or
- 2 were fitted to the data. Briefly, the partition coefficient came from [Saady et al. \(1989\)](#), the tissue
- 3 volume and the blood flow came from [Reitz et al. \(1990\)](#), the methylation and dimethylation were
- 4 fit to the data of [Buchet et al. \(1981a\)](#), and the glutathione value came from [Pilon et al. \(1988\)](#). [Yu](#)
- 5 [\(1999a\)](#) gave an incomplete explanation of how each parameter was determined, decreasing

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1 confidence in the parameters' accuracy. In [El-Masri and Kenyon \(2008\)](#), each parameter was  
2 rationally explained and the limitations were well documented.

3 [El-Masri and Kenyon \(2008\)](#) noted that adding complex inhibitory pathways to the  
4 metabolism of arsenic and its metabolites does not yield significant differences quantitatively in  
5 model simulations at relatively low levels of arsenic exposure. The impact of the complex metabolic  
6 pathways may become evident in situations in which MMA levels are higher than those produced  
7 from iAs metabolism ([El-Masri and Kenyon, 2008](#)). In general, a PBPK model—which is a simplified  
8 representation of a biological observation—can ignore nonlimiting steps (and skip the descriptions  
9 of such steps) without altering the overall pharmacokinetics prediction. Such simplification is  
10 useful when literature data are lacking for a specific enzymatic kinetic description. Hence, complex  
11 inhibitory pathways do not need to be included to apply the model in the low-dose regions.

12 Table E-4 compares the partition coefficients used in [El-Masri and Kenyon \(2008\)](#) and those  
13 used in [Yu \(1999a\)](#). The partition coefficient is an important parameter driving the distribution of  
14 parent or metabolite compounds in different compartments. As mentioned in [El-Masri and Kenyon  
15 \(2008\)](#), partition coefficients from animals such as mice are typically comparable to human values.  
16 In the [El-Masri and Kenyon \(2008\)](#) PBPK model, the partition coefficients for each tissue were  
17 estimated as described above.

**Table E-4. Comparison of partition coefficients**

Partition coefficients				
Compartment	As(V)	As(III)	MMA	DMA
<a href="#">El-Masri and Kenyon (2008)</a>				
GI (small intestine)	2.7	8.3	2.2	2.1
Skin	7.9	7.4	2.61	2.4
Brain	2.4	2.4	2.2	3.3
Muscle	7.9	7.4	2.61	2.4
Kidney	8.3	11.7	4.4	3.8
Liver	15.8	16.5	3.3	3.3
Lung	2.1	6.7	1.3	1.3
Heart	7.9	7.4	2.61	2.4
<a href="#">Yu (1999a)</a>				
GI (small intestine)	2.8	2.8	1.2	1.4
Skin	2.5	2.5	1.25	1.25
Brain	NA	NA	NA	NA
Muscle	2.6	2.6	1.8	2.8
Kidney	4.15	4.15	1.8	2.075
Liver	5.3	5.3	2.35	2.65
Lung	4.15	4.15	1.8	2.075
Heart	NA	NA	NA	NA
Fat	0.3	0.3	0.3	0.3

GI = gastrointestinal; NA = not applicable.

Note: In [Yu \(1999a\)](#), the tissue and blood partition coefficients were based on a postmortem analysis of a child weighing 16.3 kg who was poisoned [reported by [Saady et al. \(1989\)](#)]. However, [Saady et al. \(1989\)](#) only measured total As in each tissue, rather than the amount of inorganic versus methylated arsenic. Other PBPK models in the literature used optimization techniques to determine the partition coefficients ([Liao et al., 2008](#); [Mann et al., 1996a](#)).