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ABSTRACT

For 41 chemicals there exist both reasonable data on carcinogenic potency in experimental animals and also a defined Permissible Exposure Level (PEL), which is the upper limit of legally permissible chronic occupational exposure for U.S. workers. For these 41 agents, the permitted chronic human exposure is compared to the chronic dose rate that induces tumors in 50% of laboratory animals, not to estimate absolute risks directly but to derive some index (the "Permitted Exposure Rodent Potency" index, or PERP) of the relative hazards that such substances may pose. These PERP values differ by more than 100,000-fold from each other. The PERP does not take into account the actual level of exposure or the number of exposed workers. Nevertheless, it might be reasonable to give particular attention to the reduction of allowable worker exposures to substances which appear most hazardous by this index and which some workers may be exposed to full-time near the PEL. Ranked by PERP, these are: ethylene dibromide, ethylene dichloride, 1,3-butadiene, tetrachloroethylene, propylene oxide, chloroform, formaldehyde, methylene chloride, dioxane, and benzene.
INTRODUCTION

Hundreds of chemicals have been shown to induce tumors in rodents in controlled laboratory experiments, but there is a lack of direct evidence about the relevance of these laboratory results for human populations. Epidemiologic data on cancer causation are not readily obtainable, however, and only about 40 chemicals and chemical mixtures have been reliably identified as human carcinogens (1,2). We know that most chemicals that have been identified as human carcinogens have been shown to yield a positive carcinogenic response in at least one rodent species, but we do not know whether the large number of rodent carcinogens will turn out to have any substantial carcinogenic effect on humans. Nor do we have evidence indicating that one or another mathematical model is appropriate for making a quantitative assessment of human risk from the high doses administered in animal bioassays to the lower doses of most human exposures. Mechanisms of carcinogenesis are only beginning to be understood, and efforts at quantitative human risk assessment based on animal data are highly uncertain, suffering from both random and systematic errors (3,4,5). Therefore, it is not clear how best to make use of the animal data.

In this paper we propose the use of animal results to rank possible occupational hazards to people from exposures to those chemicals that are known to be carcinogenic in rodents. This approach has been suggested elsewhere (3,4,5,6) but without as much data as we now use. We propose a comparison between the dose rate at which humans are exposed to a given chemical, and the dose rate that induces a standard tumor rate in laboratory animals. The ratio of these two dose rates may well be correlated with occupational carcinogenic hazards, and if it is then by computing this ratio for a great many chemicals to which people may be exposed, a scale can be constructed to help rank possible human carcinogenic hazards. This index, the Permitted Exposure Rodent Potency index (PERP), can be calculated for very small exposures of large numbers of people (e.g. to things such as pesticide residues in
food), or for larger exposures of smaller numbers of people (e.g. to things such as inhalation of solvents by factory workers). In this paper we examine PERP values for permitted exposures in the workplace, while in another paper we report a similar index (HERP or Human Exposure Rodent Potency) for actual exposures in food, drugs, and water (5). This approach may help to adopt sensible priorities in the context of the large number of rodent carcinogens already identified.

Our group has developed a large database of the results of chronic animal cancer tests, the Carcinogenic Potency Database (CPDB) (7,8,9). Currently the CPDB includes results on approximately 1000 chemicals, and about half of these are positive in at least one animal experiment. To describe the dose rate that produces tumors in an animal experiment, this database estimates the "50% Tumorigenic Dose-Rate", or TD$_{50}$. This is defined as the chronic dose rate in mg/kg body weight/day that would halve the proportion of tumorless test animals by the end of a standard lifetime (10,11). We have found that the TD$_{50}$ values of rodent carcinogens vary more than 10 million-fold.

The availability of a numerical description of the tumorigenic dose rate for a large number of test agents makes it possible to calculate PERP values for a great many human exposures. In the present analysis of workplace exposure limits we use TD$_{50}$ values in the calculation of the PERP for the rodent dose rate, and we compare these with the Permissible Exposure Limits (PEL) set by the U.S. Occupational Safety and Health Administration (OSHA) for the occupational exposure level (12).

METHODS

Two estimates are required for the PERP: worker exposure limits and carcinogenic potency in laboratory animals. For both humans and rodents we use standard
values to calculate a daily dose rate in mg/kg body weight/day for a lifetime as follows:

\[
\text{dose rate} = \frac{\text{dose} \times \text{exposure per day as a proportion of body weight}}{\text{x proportion of life during which exposure occurs}}
\]

1. Estimation of Worker Exposure Levels

Exposure assessments for chemicals in the workplace are frequently incomplete or uneven, so the actual average daily dose levels that workers receive are not accurately known. Workplace exposures vary by occupation, type of plant, and particular plant. We have used as surrogates for this information the Permissible Exposure Limits (PEL's) set by OSHA. The PEL is the maximum allowable concentration of an airborne contaminant in workplace air on a time-weighted average basis over an 8-hour day and thus represents the maximum allowable dose for a worker per day. PEL's are specified in ppm or mg/m³ of workplace air. To convert these levels to an average daily dose rate in mg/kg body weight, we assume that a worker inhales 9.6 m³ of air per day, weighs 70 kg (13), works five days per week 50 weeks per year for 40 years, and has a standard lifespan of 70 years. We call this value the Maximum Occupational Dose Rate (MOD). The calculation for the MOD, assuming 100% absorption, is therefore:

\[
\text{PEL (in mg/m³) x 9.6 m³/day} \times \frac{5 \text{ days/week}}{\frac{50 \text{ weeks/year}}{40 \text{ yrs work}}} \times \frac{70 \text{ kg body wt person}}{70 \text{ yr life}}
\]

2. Estimation of Carcinogenic Potency in Laboratory Animals

\(T_D^{50}\) values are estimated from long-term, chronic experiments that meet a set of standard inclusion criteria, e.g. administration by an oral route or by
inhalation, a dosing period at least one-fourth the standard lifespan of 2 years for rodents, an experiment length of at least 1 year, and the presence of a control group (7,10,11). The TD$_{50}$ is that daily dose rate in mg/kg body weight/day that it is estimated would halve the proportion of survivors at the end of a standard lifespan that would otherwise remain tumorless. The estimation procedure standardizes the results of rodent experiments by taking into account the spontaneous tumor rate, using lifetable data when available, and adjusting for early termination of dosing or of the period of observation. Our standard values for animal weight, intake of food, air, and water, and standard lifespans are given in Gold et al., 1984 (7). Since the TD$_{50}$ is subject to the usual statistical uncertainties, we have estimated a confidence interval about it, and report these values in Gold et al., 1984, 1986, and 1987 (7,8,9).

TD$_{50}$ can be calculated for any particular neoplasm or group of neoplasms, so the database often contains several TD$_{50}$ values for each experiment (i.e. for one sex in one strain of one species from a single research report). In the analysis below we define a compound as carcinogenic if the author of at least one published paper evaluated it as positive, and if in addition the p-value for at least one experiment is less than 0.01. For each carcinogen we use the most potent TD$_{50}$ (i.e. the lowest numerical value, since a low TD$_{50}$ corresponds to a potent carcinogen) for any target site(s) identified by the author of the published paper.

3. Calculation of the Permitted Exposure Rodent Potency index

The PERP is defined as MOD/TD$_{50}$ x 100:

$$\frac{\text{occupational exposure-rate to workers (mg/kg/day)}}{\text{tumorigenic dose rate for 50\% of rodents (mg/kg/day)}} \times 100$$

Thus, the PERP is the daily human exposure as a percentage of the tumorigenic dose.
rate for 50% of the animals. This index is a rough measure that may be useful for prioritizing on an ordinal scale. It is not, however, intended as a direct estimate of human hazard.

4. Selection of Compounds

The present study is of chemicals for which (a) PEL's for workers have been set by OSHA and (b) our CPDB contains at least one experiment in rats or mice in which the compound was evaluated as carcinogenic. From among approximately 500 compounds in the CPDB that were evaluated as tumorigenic in at least one experiment, and about 500 chemicals that are regulated with PEL's by OSHA, only forty-one compounds are common to both. An additional 12 compounds in the CPDB are regulated by OSHA as "Toxic and Hazardous" substances but have no PEL's, e.g. benzidine and betanapthalamine. These are not included in our analysis.

In Table 1 we list the forty-one chemicals and the most potent TD50 values in rats and/or mice from the CPDB. Twenty have been found by the International Agency for Research on Cancer (IARC) to have "sufficient" evidence for carcinogenicity in animal experiments and fifteen to have "limited" evidence (1), as indicated in the Table.

The value reported in Table 1 for each species is the most potent TD50 in any experiment rather than some average of values when the database contains more than one positive experiment for a chemical. To determine how much lower the PERF would be if we were to use an average of TD50's, we compared the most potent value in any experiment to the harmonic mean obtained by using a TD50 from each positive experiment in the CPDB. For 83% of the chemicals, the two estimates of potency differ by a factor less than 2, and only two chemicals differ by more than a factor of 3: ethylene oxide (by 4) and vinyl chloride (by 6). Since these differences are small compared with the wide range of potency among different carcinogens, we conclude that overall the values in Table 1 adequately reflect carcinogenic potency in
Seventeen of the substances are carcinogenic in both rats and mice (Table 1), and we calculate the PERP using the more potent TD_{50} value regardless of which species it represents. For chemicals tested in both species but positive in only one, we make no adjustment in the PERP for the lack of a carcinogenic effect in the second species.

RESULTS

1. Ranking Potential Carcinogenic Hazards to Workers

For each chemical the PERP value in Table 2 expresses the permitted mg/kg daily dose to workers as a percentage of the rodent TD_{50}. The table presents the PERP values in descending order for the forty-one rodent carcinogens in the CPDB which have OSHA PEL's. In Figure 1 the compounds are ordered alphabetically and PERP values are presented graphically. The PERP ranges more than 100,000-fold for exposures to different substances at the current PEL. For 12 of the chemicals the permitted exposures are more than 10% of the rodent TD_{50}, for 18 they are between 1% and 10% of the rodent TD_{50}, and for 11 they are less than 1%. Three chemicals have PEL's greater than the TD_{50}, i.e. PERP greater than 100.

The 12 substances with PERP greater than 10 are: ethylene dibromide (749), ethylene dichloride (199), 1,3-butadiene (179), bis-2-chloroethylether (59), tetrachloroethylene (perchloroethylene) (48), propylene oxide (37), chloroform (27), formaldehyde (25), ethylene imine (19), methylene chloride (16), dioxane (15), and benzene (11). For many of these substances, skin absorption may occur at the PEL in addition to inhalation (see Table 2), and this is not reflected in the PERP.

Because estimates of the PERP span several orders of magnitude, whereas the TD_{50} values estimated from various experiments of the same compound are generally within one order of magnitude, we would expect little difference in the ranking of
chemicals by PERP values if we used some average of the various TD₅₀'s for a given chemical instead of the most potent TD₅₀ value. (We calculated the Spearman rank correlation coefficient between PERP's obtained from the most potent TD₅₀ value and PERP's obtained from the harmonic mean of TD₅₀'s from all positive experiments in a species. The correlation is 0.98, indicating that the ranking is not dependent upon the choice of the most potent TD₅₀.)

Bioassay results indicate that these twelve chemicals are high on other measures of hazard as well (see 14). For example, among the nine of these chemicals that have been tested in both rats and mice, all nine are positive in both species. By comparison, among the 223 carcinogens in the entire CPDB that were tested in two species, only 127 (57%) are positive in both (chi square p = 0.01). In addition, a higher proportion of these chemicals induced tumors at multiple target sites than in the entire CPDB, although the difference is not statistically significant. All of these twelve top-ranked substances have been tested in mice, and seven (58%) induced tumors at multiple sites in mice; nine have been tested in rats, and six (67%) induced tumors at multiple sites. This compares with 42% for mice and 47% for rats in the CPDB. All twelve have been evaluated by IARC as having evidence (either sufficient or limited) of carcinogenicity in laboratory animals, except methylene chloride which has only recently been tested.

2. Consideration of the Route of Administration in the Rodent Test

Worker exposure to chemicals for which PEL's have been defined is primarily by inhalation, whereas exposure to test animals is usually by diet or gavage and only infrequently by inhalation. This difference raises the question whether inhalation bioassays should be used for comparisons to human exposures whenever they are available, regardless of the results of bioassays by other routes. Ten of the forty-one chemicals with PEL's have been tested in rodents by inhalation as well as by another route (gavage in 9 cases, drinking water in one), and in Table 3 we compare the
results. There is good concordance in positivity between routes among the 10 chemicals: all but one (ethylene dichloride) have at least one positive test by both routes. This concordance is similar for each species separately, whenever two routes have been tested. Benzene is an exception, causing tumors by gavage in both species but by inhalation only in mice. (A discussion of the discordance by route for ethylene dichloride can be found in reference 15.)

Although the number of chemicals is small, a comparison of carcinogenic potency values suggests that there are no consistent or large differences by route of administration. For about half the chemicals the more potent route is inhalation and for the other half it is gavage. In addition, these differences are within an order of magnitude, with the exception of benzene. Such differences must be viewed within the context of the usual variation in TD\textsubscript{50} that we have found in other analyses of the CPDB. Only five of the route comparisons in Table 3 involve experiments using the same strain within a species, and all of these are concordant in positivity. For these cases we have also compared potency values for males and females separately, and found that the variation in potency is comparable with the variation obtained in our large database for experiments using the same route, species, strain and sex (16). Therefore, route of administration in the rodent bioassay has no large or consistent effect on positivity or potency, and the use of results from tests using routes other than inhalation is reasonable. We note that of the 9 rodent carcinogens positive by two routes of administration, 5 have a common target site by the two routes.

3. Consideration of the Number of Exposed Workers

It is relevant to consider, even if it is not explicitly used, information about the size of the exposed population as well as information about the permitted exposure levels in humans and the carcinogenic potency in rodents. The number of U.S. workers exposed to different chemicals varies widely, and it changes over time
due to alterations in markets, production techniques, and product substitution. Crude estimates of the numbers of workers who might be exposed to various compounds are available from the National Occupational Hazard Survey (NOHS) of 1972-74, updated during 1981-1983. The survey is representative of 38 million workers, but excludes such industries as mining and agriculture (and the military). Estimates—which are subject both to systematic errors and to sizable statistical errors—are included for "full-time" exposure, i.e. an average of more than four hours per working day; and for "part-time" exposure, i.e. an average of more than 27 minutes per working week.

In Table 4 we report the exposure estimates for the thirty-nine of the forty-one carcinogens with PEL's that were identified in the NOHS survey; the chemicals are ranked by PERF value. In general, there are strikingly fewer workers exposed full-time than part-time, but this is less true for many of the top twelve chemicals than for the other twenty-nine. In Figure 1, the PERF values for those chemicals to which no workers are exposed full time are indicated with unshaded bars.

To include the number of workers in our prioritization, we considered multiplying the PERF by the number potentially exposed full-time or part-time. This had, however, little effect on which chemicals would be ranked as appearing most important: of the top twelve chemicals, all except bis-2-chloroethylether and ethylene imine (which have no full-time exposures and few part-time exposures) remain ranked among the highest in possible hazard. Two additional compounds, trichloroethylene and carbon tetrachloride, to which many workers are exposed, replaced these two in the "top twelve". (However, we expect that exposures to trichloroethylene have been reduced in recent years due to product substitution).

DISCUSSION

The PERF may provide a rough correlate of human hazard from exposures to chemicals that are known to cause tumors in laboratory animals. We have used the PEL as
a surrogate for the estimates of exposure levels, and have shown that the margin of protection offered by current PEL values, to workers from exposures to different rodent carcinogens varies more than 100,000-fold. This wide variation occurs partly because PEL's are not generally based on rodent carcinogenicity, but rather on consensus standards adopted in the 1970's to protect workers from other health effects.

For some substances, workers are permitted to be exposed to doses that are close to those that produce tumors in 50% of test animals. The PERF values for 12 compounds are greater than 10% of the TD$_{50}$ estimated from an experiment in rats or mice: ethylene dibromide, ethylene dichloride, 1,3-butadiene, (bis-2-chloroethylether), tetrachloroethylene, propylene oxide, chloroform, formaldehyde, (ethylene imine), methylene chloride, dioxane, and benzene. These twelve chemicals also score high on other indices of hazard in rodent bioassays, and (with the exception of the two in brackets) in a prioritization using the number of exposed workers - indeed, eight of these compounds are among the top 50 chemicals by volume produced in the U.S. (17).

The PERF is calculated as if exposures to a chemical could occur at a reasonably constant annual level for an entire lifetime, but it remains a valid correlate of potential hazard even though workplace exposures rarely last for an entire working life. In addition, the PERF is based on exposures to individual agents. Some workers may be exposed to several carcinogens, and we have little knowledge about the potential interactions among these agents - or perhaps more importantly, between these agents and the major known causes of human cancer, such as tobacco. The potential hazards from different substances may also depend on further toxicological data such as mechanism of action, pharmacokinetics, and shape of the dose response (5).

For some of the chemicals with the highest PERF values, California OSHA has lowered the PEL below that of the U.S. OSHA e.g. ethylene dibromide, methylene
chloride, and propylene oxide (18), and so in California these would be less extreme than they appear in Figure 1. U.S. OSHA recently lowered the PEL for ethylene oxide by 50-fold, and the new PEL has been used in Figure 1. A PERP for the old PEL would have ranked ethylene oxide fourth among the chemicals in our analysis, while the PERP for the new PEL (1.3) is lower than for most of the other 40 rodent carcinogens. In contrast, the PEL for ethylene dibromide remains much higher than any other agent, for the OSHA proposal (1983) to reduce it from 20 ppm to 0.1 ppm (19) has not at present been adopted. For some substances, the numbers of workers exposed have been reduced due to recently curtailed usage, e.g. DDT, DBCP, aldrin, dieldrin, and heptachlor.

The American Conference of Governmental Industrial Hygienists (ACGIH), a non-regulatory group, recommends that exposures to nine of the twelve top-ranked chemicals be limited to levels lower than designated by the PEL (20). Their recommendations, called Threshold Limit Values (TLV's) are 3 to 5 fold lower for ethylene dichloride, bis-2-chloroethyl ether, tetrachloroethylene, propylene oxide, chloroform, formaldehyde, methylene chloride, and dioxane. The TLV for 1,3-butadiene was recently lowered to a level that is 100-fold lower than the PEL; actual workplace exposures for butadiene were already below that level. This is not the case for all compounds, however; for some, exposures near to the PEL are common.

We have examined reports of actual concentrations in workroom air for a few of the substances which ranked highest by PERP: ethylene dibromide, formaldehyde, and tetrachloroethylene. Exposures to workers vary substantially by job classification, type of plant, and particular plant. For operators in an ethylene dibromide production plant, average exposures were about one-fifth the PEL (21). For machine operators in dry cleaning establishments, average exposures to tetrachloroethylene (perchloroethylene) were also about one-fifth the PEL (22). Exposures to formaldehyde were about one-third the PEL for workers in chemical manufacturing plants, plywood
production, and wood furniture production. The average for all workers exposed to formaldehyde was about one-fourth the PEL (23). In contrast, even for workers with high levels of exposure to 1,3-butadiene, the average exposures were only one-one hundredth the PEL (24). These actual exposure estimates indicate that for ethylene dibromide, tetrachloroethylene, and formaldehyde, the PERP values calculated at the PEL are reasonable correlates of the possible hazard to some workers, and the actual exposures are not far from the doses that induce tumors in half of the laboratory animals. That does not necessarily mean, however, that as far as the general population is concerned these agents would be the chief priorities, for the intensity of exposure of workers to particular agents may be several orders of magnitude greater than that of the general population.

For example, the actual exposure data for ethylene dibromide, tetrachloroethylene, and formaldehyde illustrate that some workers receive very high levels of these chemicals in comparison to the general population. The daily intake by inhalation for operators in an ethylene dibromide production plant is about 1650 ug/kg/day, while the average American dietary intake of ethylene dibromide from grains and grain products is 0.006 ug/kg/day (25). Thus, some actual worker exposures are about a quarter of a million times higher than the average population exposures to grain residues. But while the OSHA PEL remains high, the EPA banned the use of ethylene dibromide as a grain fumigant. Dry-cleaning operators may actually receive 7300 ug/kg/day of tetrachloroethylene (perchloroethylene). In contrast, people drinking one liter per day of heavily contaminated well water (Woburn well) would receive only 0.3 ug/kg/day (26), which is 20,000 times smaller. Yet, the regulations now being introduced affect water rather than workers. In contrast, for formaldehyde, inhalation exposures from indoor air in homes may be quite high, i.e. 8 ug/kg/day (27) which is within an order of magnitude of the 67 ug/kg/day received by workers engaged in formaldehyde production or plywood manufacture.
These comparisons illustrate the usefulness of the PERP as an index to help rank the possible carcinogenic hazards of chemical exposures from a variety of sources. Both the PERP and the numbers of workers exposed are relevant in formulating priorities. The PERP based upon current PEL's combined with the crude estimates of numbers exposed, suggests that it is reasonable to give special consideration to the reduction of allowable worker exposures to: ethylene dibromide, ethylene dichloride, 1,3-butadiene, tetrachloroethylene, propylene oxide, chloroform, formaldehyde, methylene chloride, dioxane and benzene.
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Table 1. Carcinogenic potency (TD$_{50}$) in rats and mice of forty-one rodent carcinogens regulated by OSHA PEL's

| CHEMICAL                        | MOST POTENT TD$_{50}$ in mg/kg/day |
|---------------------------------|-----------------------------------|
| **acrylonitrile**               | RATS: 5.31                        |
| *aldrin                         | NT                                |
| *aniline$^a$                    | ?                                 |
| **o-anisidine$^a$               | 88.0                              |
| *benzene                        | 27.8                              |
| *bis-2-chloroethylether         | NT                                |
| **1,3-butadiene                 | NT                                |
| carbaryl                        | 14.1                              |
| **carbon tetrachloride          | 390                               |
| *chloroform                     | 51.1                              |
| **DBCP                          | 119                               |
| **DDT                           | 0.106                             |
| *dieldrin                       | NT                                |
| **1,1-dimethylhydrazine         | 126                               |
| **dioxane                       | 1.10                              |
| **ethylene dibromide            | 5.49                              |
| **ethylene dichloride           | NT                                |
| *ethylene imine                 | NT                                |
| **ethylene oxide                | 7.43                              |
| **di(2-ethylhexyl)phthalate     | 2280                              |
| **formaldehyde                  | 0.798                             |
| *heptachlor                     | NT                                |
| *hexachloroethane               | NT                                |
| **hydrazine                     | NT                                |
| *hydrogen peroxide (90%)        | NT                                |
| *lindane                        | NT                                |
| methylene chloride              | NT                                |
| methyldihydrzine                | NT                                |
| p-nitrochlorobenzene            | NT                                |
| **PCB-54%                       | NT                                |
| *phenylhydrazine$^a$            | NT                                |
| **propylene oxide               | NT                                |
| *selenium compounds$^b$         | 6.14                              |
| **1,1,2,2-tetrachloroethane     | 6.14                              |
| *tetrachloroethylene            | 598                               |
| **o-toluidine$^a$               | 23.3                              |
| **toxaphene                     | NT                                |
| **1,1,2-trichloroethane         | NT                                |
| *trichloroethylene              | NT                                |
| **vinyl chloride                | 3.69                              |

Symbols:  NT = No test in CPDB; ? = In one report, author evaluated the chemical as carcinogenic to rats without identifying a target site. For the category "all tumor-bearing animals" there was no dose-related effect (p=1); - = No experiment in CPDB was evaluated by the published author as evidence for carcinogenicity; ** = IARC evaluation is sufficient evidence of carcinogenicity in experimental animals; * = IARC evaluation is limited evidence of carcinogenicity.

$^a$The TD$_{50}$ is for the hydrochloride salt.

$^b$The TD$_{50}$ is for selenium sulfide.
Table 2. Forty-one rodent carcinogens regulated by OSHA PELs ranked by PERP: Carcinogenic potency in rodents (TD₅₀), OSHA PEL and MOD

| CHEMICAL                      | PERP: MOD/TD₅₀ x 10₀ᵃ | OSHA PEL ppm | TD₅₀ mg/m³ | MOD (mg/kg)ᵇ | OSHA PEL (mg/kg)ᶜ |
|-------------------------------|------------------------|--------------|------------|---------------|--------------------|
| ethylene dibromide [s]        | 749                    | 20           | 153        | 1.10          | 8.24               |
| ethylene dichloride           | 199                    | 50           | 202        | 5.49          | 10.9               |
| 1,3-butadiene                 | 179                    | 1000         | 2200       | 65.9          | 118                |
| bis-2-chloroethylether [s]    | 59.1                   | 15           | 90         | 8.19          | 4.84               |
| tetrachloroethylene           | 48.3                   | 100          | 678        | 75.6          | 36.5               |
| propylene oxide               | 36.8                   | 100          | 240        | 35.1          | 12.9               |
| chloroform                    | 26.9                   | 50           | 240        | 48.0          | 12.9               |
| formaldehyde                  | 24.9                   | 3            | 3.7        | 0.798         | 0.199              |
| ethylene imine [s]            | 19.1                   | 0.5          | 1          | 0.283         | 0.054              |
| methylene chloride            | 15.6                   | 500          | 1737       | 598           | 93.5               |
| dioxane [s]                   | 15.4                   | 100          | 360        | 126           | 19.4               |
| benzene [s]                   | 11.4                   | 10           | 32         | 15.1          | 1.72               |
| trichloroethylene             | 6.91                   | 100          | 540        | 421           | 29.1               |
| 1,1,2,2-tetrachloroethane [s] | 5.31                   | 5            | 35         | 35.4          | 1.88               |
| 1,1,2-trichloroethane [s]     | 5.08                   | 10           | 45         | 47.6          | 2.42               |
| o-toluidine [s]               | 5.06                   | 5            | 22         | 23.3          | 1.18               |
| acrylonitrile [s]             | 4.56                   | 2            | 4.5        | 5.31          | 0.242              |
| vinyl chloride [s]            | 3.79                   | 1            | 2.6        | 3.69          | 0.140              |
| hydrazine [s]                 | 3.18                   | 1            | 1.3        | 2.20          | 0.070              |
| carbon tetrachloride [s]      | 2.67                   | 10           | 63         | 127           | 3.39               |
| 1,1-dimethylhydrazine [s]     | 2.58                   | 0.5          | 1          | 2.09          | 0.054              |
| heptachlor [s]                | 2.48                   | 0.5          | 1          | 1.09          | 0.027              |
| dieldrin [s]                  | 2.37                   | 0.25         | 0.547      | 0.013         |                    |
| carbaryl                      | 1.91                   | 5            | 14.1       | 0.269         |                    |
| aldrin [s]                    | 1.75                   | 0.25         | 0.741      | 0.013         |                    |
| phenylhydrazine [s]           | 1.67                   | 5            | 22         | 70.6          | 1.18               |
| ethylene oxide                | 1.31                   | 1            | 1.8        | 7.43          | 0.097              |
| chlordane [s]                 | 1.26                   | 0.5          | 2.15       | 0.027         |                    |
| DDT [s]                       | 1.19                   | 1            | 4.55       | 0.054         |                    |
| aniline [s]                   | 1.16                   | 5            | 19         | 88.0          | 1.02               |
| toxaphene [s]                 | 0.662                  | 0.5          | 4.08       | 0.027         |                    |
| DBCP                          | 0.509                  | 0.001        | 0.01       | 0.106         | 0.001              |
| methylhydrazine [s]           | 0.415                  | 0.2          | 0.35       | 4.58          | 0.019              |
| PCB-54% [s]                   | 0.282                  | 0.5          | 9.58       | 0.027         |                    |
| selenium compounds            | 0.179                  | 0.2          | 6.14       | 0.011         |                    |
| lindane [s]                   | 0.175                  | 0.5          | 15.4       | 0.027         |                    |
| hexachloroethane [s]          | 0.150                  | 1            | 10         | 359           | 0.538              |
| o-anisidine [s]               | 0.097                  | 0.5          | 27.8       | 0.027         |                    |
| p-nitrochlorobenzene [s]      | 0.013                  | 1            | 430        | 0.054         |                    |
| di(2-ethylhexyl)phthalate     | 0.012                  | 5            | 2280       | 0.269         |                    |
| hydrogen peroxide (90%)       | 0.001                  | 1            | 1.4        | 9010          | 0.075              |

ᵃPERP: Permitted Exposure Rodent Potency.
ᵇMost potent TD₅₀, calculated to three significant figures.
ᶜMOD: Maximum occupational dose.

[s]: OSHA indicates that these substances may be absorbed into the bloodstream through the skin, mucous membranes and/or eyes, as well as by inhalation.

For bis-2-chloroethylether, chloroform and methylhydrazine, OSHA PEL's are ceiling values.
Table 3. Comparison of inhalation and oral routes of administration by species: positivity and most potent $TD_{50}$.

| Chemicals | Rats | Mice |
|-----------|------|------|
|           | inhalation | gavage | inhalation | gavage |
| acrylonitrile | 32.4* | 5.31* | NT | NT |
| benzene | - | 51.1 | 441 | 15.1 |
| DBCP | 0.106 | 0.855 | 1.28* | 4.29* |
| ethylene dibromide | 1.10 | 1.26 | 9.60* | 2.34* |
| ethylene dichloride | - | 5.49 | - | 61.2 |
| ethylene oxide | 30.8 | 7.43 | NT | NT |
| propylene oxide | 35.1 | 39.5 | 732 | NT |
| tetrachloroethylene | 90.8 | I | 190* | 75.6* |
| trichloroethylene | - | - | 3380 | 421 |
| vinyl chloride | 3.69* | 14.2* | 10.6 | NT |

Symbols: * = $TD_{50}$ values are estimated from experiments by different routes using the same species and strain of test animal; NT = no test in CPDB; - = No experiment in CPDB was evaluated by the published author as evidence of carcinogenicity in experimental animals; I = The National Cancer Institute evaluated its experiment as inadequate.

*aRoute of administration by water.

The large Carcinogenic Potency Database contains data for two additional chemicals that were tested by inhalation and an oral route: (1) dichlorvos was not positive by either inhalation or diet; (2) vinylidene chloride was negative in rats by inhalation, water, and diet; it was negative in mice by diet and positive by inhalation.
Table 4: Estimated number of workers potentially exposed full-time and/or part-time to rodent carcinogens with OSHA PEL's ranked by PERP

| Chemicals to which workers are exposed | PERP | Full-time | Part-time | Part-time | Full-time |
|----------------------------------------|------|-----------|-----------|-----------|-----------|
| ethylene dibromide                     | 749  | 108,878   | 107,939   | 1,234     |
| ethylene dichloride                    | 199  | 1,351,190 | 1,341,952 | 23,834    |
| 1,3-butadiene                          | 179  | 69,555    | 57,169    | 14,812    |
| bis-2-chloroethylether                 | 59.1 | 42        | 42        |           |
| tetrachloroethylene                    | 48.3 | 1,597,072 | 1,569,580 | 44,350    |
| propylene oxide                        | 36.8 | 268,433   | 268,056   | 1,047     |
| chloroform                             | 26.9 | 215,000   | 211,170   | 14,757    |
| formaldehyde                           | 24.9 | 1,420,588 | 1,387,416 | 51,436    |
| ethylene imine                         | 19.1 | 1,712     | 1,712     |           |
| methylene chloride                     | 15.6 | 2,175,499 | 2,148,454 | 42,207    |
| dioxane                                | 15.4 | 307,076   | 305,016   | 5,722     |
| benzene                                | 11.4 | 1,495,706 | 1,473,236 | 40,844    |
| trichloroethylene                      | 6.91 | 2,782,797 | 2,726,858 | 86,587    |
| 1,1,2,2-tetrachloroethane              | 5.31 | 7,201     | 7,201     |           |
| 1,1,2-trichloroethane                  | 5.08 | 72,191    | 72,196    | 202       |
| o-toluidine                            | 5.06 | 13,058    | 13,053    | 143       |
| acrylonitrile                          | 4.56 | 374,345   | 350,239   | 25,245    |
| vinyl chloride                         | 3.79 | 239,375   | 232,827   | 8,186     |
| hydrazine                              | 3.18 | 11,187    | 10,528    | 1,156     |
| carbon tetrachloride                   | 2.67 | 1,380,232 | 1,371,253 | 21,457    |
| 1,1-dimethylhydrazine                  | 2.58 | 25        | 25        |           |
| heptachlor                             | 2.48 | 566,911   | 565,780   |           |
| dieldrin                               | 2.37 | 5,159     | 5,159     |           |
| carbaryl                               | 1.91 | 14,117    | 14,117    |           |
| aldrin                                 | 1.75 | 5,239     | 5,236     |           |
| phenylhydrazine                        | 1.67 | 1,120     | 1,120     |           |
| ethylene oxide                         | 1.31 | 144,152   | 142,383   | 2,767     |
| chlor dane                             | 1.26 | 21,171    | 21,171    |           |
| DDT                                    | 1.19 | ND        | ND        |           |
| aniline                                | 1.16 | 852,757   | 847,831   | 14,941    |
| toxaphene                              | 0.662| 203       | 203       |           |
| DBCP                                   | 0.509| 9,681     | 9,597     | 84        |
| methylhydrazine                        | 0.415| ND        | ND        | ND        |
| PCB-54%                                | 0.282| 6,540     | 6,540     |           |
| selenium compounds                     | 0.179| 108,695   | 106,543   | 3997      |
| lindane                                | 0.175| 173,240   | 171,875   | 1,663     |
| hexachloroethane                       | 0.150| 1,489     | 1,489     |           |
| o-anisidine                            | 0.097| 83        | 83        |           |
| p-nitrochlorobenzene                   | 0.013| 17,725    | 17,638    | 84        |
| di(2-ethylhexyl)phthalate              | 0.012| 612,106   | 588,488   | 33,855    |
| hydrogen peroxide (90%)                | 0.001| 467,089   | 465,603   | 11,256    |

Data on number of exposed workers is derived from National Occupational Hazard Survey (NOHS) of 1972-74. (National Institute of Occupational Safety and Health, personal communication, D. Sundin, 1986.)

Exposures include: actual - surveyor observed the agent; tradename - surveyor observed a tradename product known to contain agent; and generic - surveyor observed a product in some type of general use which leads NIOSH to suspect that the agent may be in that product. Number of potentially exposed full-time and part-time combined may be lower than the sum of part-time and full-time because of NOHS method of estimation based on actual, trade name and generic exposures. Numbers represent workers potentially exposed to the substance regulated with a PEL, regardless of whether the TD50 is for a salt. ND = no data in NOHS.
Figure Legend

Shaded bars indicate that some workers are potentially exposed full-time to the chemical. White bars indicate that no workers are potentially exposed full-time.
### Table: Comparison of Permitted Worker Exposure Levels to the Dose That Induces Tumors in 50 Percent of Rodents (TD$_{50}$)

| Chemical                                      | PERP |
|-----------------------------------------------|------|
| ACRYLONITRILE                                 | 4.56 |
| ALDRIN                                        | 1.75 |
| ANILINE                                       | 1.18 |
| 0-AMINOSALICYL                                | 0.097|
| BENZENE                                       | 11.4 |
| BIS-2-CHLOROETHYLETHER                        | 58.1 |
| 1,3-BUTADIENE                                 | 179  |
| CARBARYL                                      | 1.91 |
| CARBON TETRACHLORIDE                          | 2.67 |
| CHLORDANE                                     | 1.26 |
| CHLOROFORM                                    | 25.9 |
| DBCP                                          | 0.509|
| DDT                                           | 1.18 |
| DIELDRIN                                      | 2.37 |
| 1,1-DIMETHYLDIAZINE                           | 2.58 |
| DIOXANE                                       | 10.4 |
| ETHYLENE DIBROMIDE                            | 7.49 |
| ETHYLENE DICHLORIDE                           | 199  |
| ETHYLENE IMINE                                | 18.1 |
| ETHYLENE OXIDE                                | 1.31 |
| D(2-ETHYLHEXYL)PHTHALATE                     | 0.012|
| FORMALDEHYDE                                  | 24.9 |
| HEPTACHLOR                                    | 2.48 |
| HEXACHLOROETHANE                              | 0.150|
| HYDRAZINE                                     | 3.18 |
| HYDROGEN PEROXIDE (90%)                       | 0.001|
| LINDANE                                       | 0.175|
| METHYLENE CHLORIDE                            | 15.4 |
| METHYLDIAZINE                                 | 0.415|
| P-NITROCHLOROBENZENE                          | 0.013|
| PCB-54%                                       | 0.282|
| PHENYLDIAZINE                                 | 1.67 |
| PROPYLENE OXIDE                               | 36.0 |
| SELENIUM COMPOUNDS                            | 0.179|
| 1,1,2,2-TETRACHLOROTANE                      | 5.31 |
| TETRACHLOROETHYLENE                           | 48.3 |
| O-TOLUIDINE                                   | 6.08 |
| TOXASENE                                      | 0.082|
| 1,1,2-TRICHLOROTHANE                         | 5.08 |
| TRICHLOROETHYLENE                             | 6.91 |
| VINYL CHLORIDE                                | 3.79 |
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