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# Approaches to Pesticide Cumulative Risk Assessment: Policy, Practice, Experimentation

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#### Outline: Policy & Practice

- 1. Introduction: regulatory context, guidance documents, key principles
- 2. Hazard Assessment: relative potency factor approach
- 3. Exposure Assessment: food, water, residential
- 4. Cumulative assessment & 'Track Back'
- 5. Summary

#### Introduction



- EPA's Office of Pesticide Programs is a licensing program regulating pesticide products in the U.S.
  - Review effects of pesticides on human and ecological health
- Food Quality Protection Act (FQPA, 1996)
  - Requires EPA to take into account when setting pesticide tolerances:
    - > "available evidence concerning the cumulative effects on infants and children of such residues and other substances that have a <u>common mechanism of toxicity</u>."



#### Introduction



- Under FQPA (1996), cumulative risk is defined as:
  - The risk associated with a group of chemicals that are toxic by a common mechanism from all pathways
  - Multi-chemical & Multi-pathway
    - > Food, drinking water, consumer uses
    - > Routes of exposure (oral, dermal, inhalation)

#### Introduction: CRA Guidance



Guidance on Cumulative Risk Assessment of Pesticide Chemicals That Have a Common Mechanism of Toxicity



Office of Pesticide Programs U.S. Environmental Protection Agency Washington, D.C. 20460

January 14, 2002

- OPP developed guidance document for cumulative risks assessments under FQPA
  - Established core principles for performing cumulative risk assessments
  - Developed tools for calculating multichemical and multipathway risk estimates
  - · Not a 'recipe book'

http://www.epa.gov/oppfead1/trac/science/#common

# Introduction: Key Principles

- Appropriately Integrate Toxicology & Exposure Data
  - Time-Frame Considerations
    - > Time to peak effect? Time to recovery?
    - > When does the exposure occur? What is the duration of exposure?
- Strive for Realistic & Accurate Assessments
  - Use Representative Data
  - Avoid Compounding Conservatisms
- Preserve and Maintain Geographic, Temporal & Demographic Specificity
  - · Calendar-Base Approach

**Emphasis of presentation** at CRA Workshop

- Be Able to "Track Back" Sources of Exposures & Perform Sensitivity Analyses
  - Major Risk Contributors

### Basic Steps in a Pesticide Cumulative Risk Assessment

- A ROOF
- Identify common mechanism group (CMG)
- Determine relevant exposure scenarios/pathways
- Identify cumulative assessment group (CAG)
- Consider appropriate method(s) & data sources
- Conduct assessment
  - Characterize & select common mechanism endpoint(s), determine chemical potency & select index chemical
  - Convert pesticide residues to equivalents of the index chemical
  - Combine/integrate food, water, & residential exposures on an internally consistent manner which incorporates demographic & temporal-spatial factors

#### Introduction: CMG Guidance

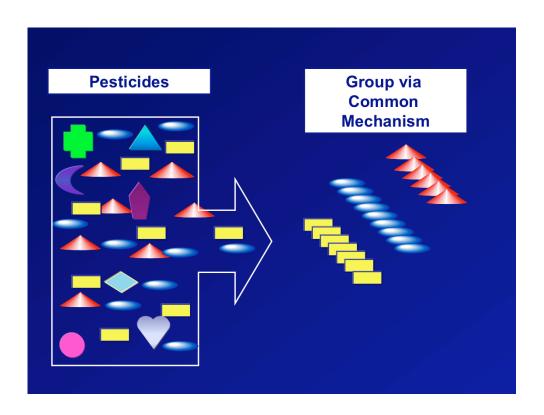
GUIDANCE FOR IDENTIFYING PESTICIDE CHEMICALS AND OTHER SUBSTANCES THAT HAVE A COMMON MECHANISM OF TOXICITY

(January 29, 1999)

- Mechanism of Toxicity--Major steps leading to an adverse health effect following interaction of a pesticide with biological targets. All steps leading to an effect do not need to be specifically understood
- Common Mechanism--Two or more pesticide chemicals that cause a common toxic effect...by the same, or essentially the same, sequence of major biochemical events

http://www.epa.gov/fedrgstr/EPA-PEST/1999/February/Day-05/6055.pdf

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- Three general principles to guide common mechanism determinations:
  - Act on the same molecular target at the same target tissue,
  - · Act by the same biochemical mechanism of action, possibly sharing a common toxic intermediate
  - · Cause the same critical toxic effect
    - > Called the common toxic effect

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### Common Mechanism of Toxicity?

- Is there concordance in dose response and timing between the major steps and the toxic effect?
- Is it biologically/chemically plausible?
- What are strengths & uncertainties of the available data?
- Could there be other an alternative mechanism(s) of action?

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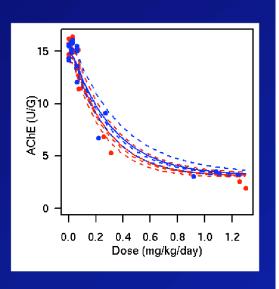
- PBPK models would be preferred
  - In vivo and in vitro pharmacokinetic data not available at this time
  - Multi-chemical, multi-pathway models not available
- Relative toxic potency of each chemical is calculated in comparison to "index chemical"

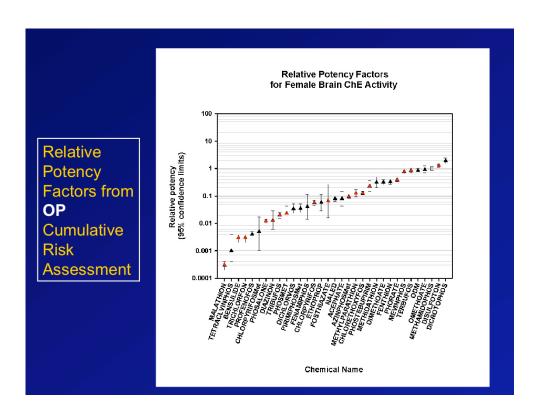
RPF = 
$$\frac{\text{Index Chemical}_{BMD}}{\text{Chemical } n_{BMD}}$$

 Exposure equivalents of index chemical are combined in the cumulative risk assessment

#### OP CRA Hazard & Dose Response

- Collaborative effort with EPA-ORD
- Rat data collected from studies at 21 days or longer where inhibition is no longer changing (ie, steady state)
- Use of multiple studies provides robust estimate of pesticide potency & incorporates variability across studies

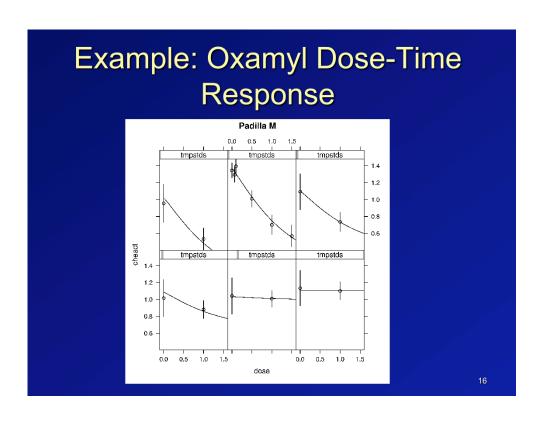


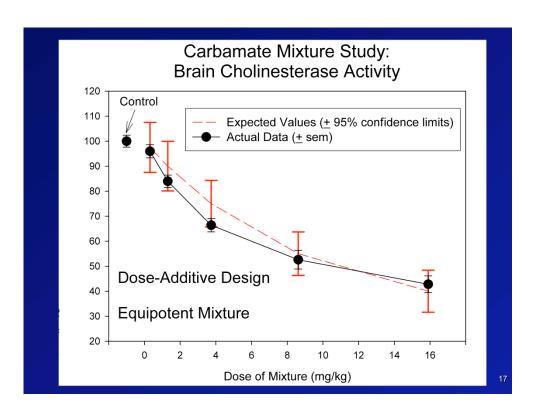


# NMC CRA Hazard & Dose Response



- Collaborative effort with ORD
  - Benchmark modeling and dose-response and time course laboratory studies
- Relative potencies are estimated along with recovery half lives from acute (single dose) rat dose-time response data at or near peak
- Dose & Time Course Model Used
  - Dose-response portion of model is similar to that used for AChE inhibition by organophosphates
  - Time course model reflects an exponential decay of inhibition
- Rapid nature of NMC toxicity----Exposure assessment on single day exposures only





# Exposure Assessment & Probabilistic Techniques



- Probablistic exposure techniques are routinely applied by OPP for virtually all its pesticide risk assessments
  - More accurate estimate of the entire range of exposures and their associated probabilities
- OPP's Cumulative Risk Assessments rely on probabilistic (Monte-Carlo) techniques to evaluate exposure
  - · Food, drinking water, residential uses, multi-pathway

### Exposure Assessment Software & Modeling



- Development of probabilistic models that permit time-based integration of residential, food, and water exposures to pesticides
  - "Time-Based Integration" = Calendar-based approach
  - Allow probabilistic combining of exposures through multiple pathways and routes
    - > Single chemical or Multi-chemical
    - > Food, Drinking Water, Residential
    - > Ingestion, Inhalation, Dermal absorption



# Exposure Assessment Software & Modeling

- Key concept: Must track potentially exposed persons on a daily basis in a way that preserves all appropriate linkages and appropriately allows for co-occurring exposures
  - Age, sex, behavior, region, etc.

#### Exposure Assessment Software

- OPP has used several software models to perform its risk assessments
- Presented to FIFRA SAP by OPP along with model development teams
  - Lifeline
  - CARES
  - DEEM/Calendex
  - SHEDS
- All four models
  - conform to EPA & OPP guidance
  - have undergone peer review
  - · are publicly available

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# Exposure Assessment Software & Modeling



- Inputs include
  - Toxicity information (e.g RfD, BMD, NOAEL)
  - Exposure information
    - > Residues
    - > Food consumption (from USDA's CSFII)
    - > Behavior information (e.g., hand to mouth behavior)
- Output includes
  - Exposure levels (mg/kg bwt/day)
  - Risk metric (% RfD occupied, Margin of Exposure)
  - Risk "drivers"
    - chemical(s), commodities, or residential uses which contribute significantly to risk

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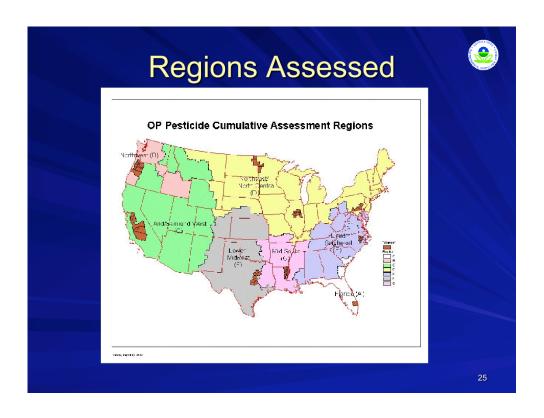
# Exposure Assessment Software & Modeling

- Use data from well-known surveys to generate and evaluate specific daily exposures for individuals
  - Use available databases to address each component of simulation
  - Incorporates seasonal and other aspects

#### Populations Groups Assessed

- Separate assessments were based on survey information on the following age groups:
  - Infants <1</li>
  - Children 1 2 years old
  - Children 3 5 years old
  - Children 6 12 years old
  - Youths 13 19 years old
  - Adults 20 49 years old
  - Adults 50+ years old
  - Females 13 49





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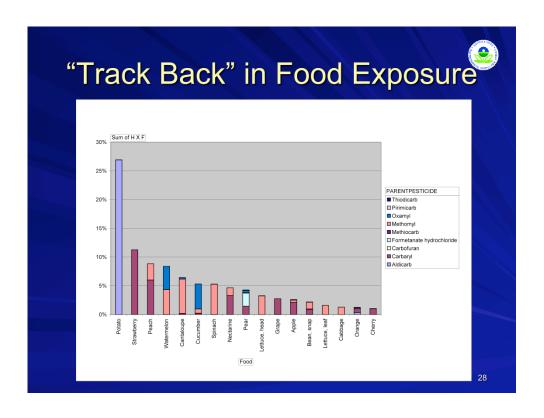
#### Software Inputs: CSFII 1994-96/1998 Food Consumption Survey



- Nationally Representative/Statistically-Based
  - Intakes of individuals residing in 50 states and D.C.
  - 21,662 individual participants interviewed over the period
- 1998 Supplemental Children's Survey
  - ~5000 children
  - birth through 9 years old
  - integrated into 1994-96 CSFII
- Consisted of:
  - 2 non-consecutive days using in-person 24 hour recalls (ca. 3-10 days apart)
- Covers all seasons of year and all days of week

# USDA Pesticide Data Program (PDP) Residue Data

- Statistically-reliable sampling procedure designed to be representative of US food supply
  - Approximately 600 samples per commodity per year
- Samples collected at terminal markets and distribution centers
  - · Samples prepared as if for consumption
- PDP has tested more than 50 different commodities and more than 300 pesticides/metabolites
  - Fresh/frozen/canned fruits & vegetables, fruit juices, milk, grains, meat/poultry/pork, corn syrup, etc.
  - · Emphasis on children's foods
- Reliable analytical methods with low limits of detection



#### **Cumulative DW Assessment**



- Regional level screen
- Watershed-based modeling for surface water sources
- Shallow ground water for private wells
- "Typical" usage patterns
- Daily distribution over multiple years
- Estimates compared with, calibrated against monitoring

### For DW, Each Regional Location Reflects ...

- Geographic area with high potential for combined (cumulative) exposure
  - Influenced by both use and relative toxicities
- Location-specific conditions
  - environmental data (soil/site, weather, crops)
  - Major crop-pesticide combinations within that area
- Vulnerable drinking water sources within the region

### Residential Exposure Assessment



- Extensive use of survey data and other pesticide use information
- Use of distributions for residues and behavior/activity elements
  - Hand-to-mouth activities
  - Choreographed adult activities/Non-scripted play
  - Transfer Coefficients/Dislodgeable Foliar Residue
- Use of a calendar based model to address the temporal use of residential uses
- Region-specific analyses

# Residential Exposure Assessment

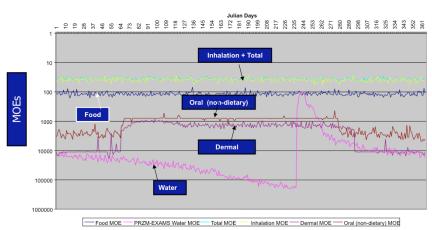


- Assessment performed for the following uses:
  - Indoor Uses
  - Pet Uses
  - Home Lawn and Garden
  - Golf Course
  - Public Health Uses



### Example of Time based exposure profile: Organophosphates

Cumulative MOEs for Children 1-2 Region A Seven Day Rolling Average Analysis



Day of the Year

#### Public Participation Process

- Numerous Public Technical Briefings on methods and approaches for cumulative risk assessment and results
- FIFRA Science Advisory Panel meetings on methods and approaches
  - More than 20
- Preliminary assessment –public comment and Science Advisory Panel meetings
- Revised assessment(s)-public comment
- Website dedicated to cumulative risk assessment http://www.epa.gov/pesticides/cumulative/

# Pesticide Cumulative Risks



- Organophosphates (OP)
- N-methyl carbamates
- Triazines
- Chloroacetanilides

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#### Pesticide Cumulative Risks

- Pyrethroids—Work has only just begun
  - Draft common mechanism grouping reviewed & supported by SAP, June 2009
  - OPP & ORD developing PBPK models for use in the pyrethroid cumulative risk assessment
  - Linkage between probabilistic exposure assessment (SHEDS) and PBPK models

# **Key Principles**



- Appropriately Integrate Toxicology & Exposure Data
  - Time-Frame Considerations
    - > Time to peak effect? Time to recovery?
    - > When does the exposure occur? What is the duration of exposure?
- Strive for Realistic & Accurate Assessments
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- Preserve and Maintain Geographic, Temporal & Demographic Specificity
  - · Calendar-Base Approach
- Be Able to "Track Back" Sources of Exposures & Perform Sensitivity Analyses
  - Major Risk Contributors





# Approaches to Pesticide Cumulative Risk Assessment: Policy, Practice, Experimentation

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  - Drs. Chris Gennings, Hans Carter, Jr.
  - Graduate students including but not limited to Michelle Casey, Adam Hamm
- Technical collaborations: US EPA
  - Drs. Dave Herr, Stephanie Padilla, Anna Lowit, Jane Ellen Simmons
  - Pam Phillips, Kathy McDaniel, Renée Marshall

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# Background

- Humans are exposed to multiple chemicals
- Effects of chemical mixtures may not be adequately predicted by studying individual chemicals
- Component-based mixtures risk assessment is aided by experimental design combining:
  - exposure evaluations
  - quantitative chemical information
  - appropriate statistical analyses

# Theories of Additivity

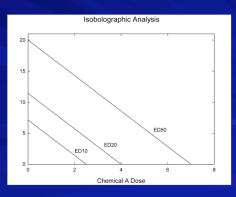
- Terminology
  - Zero interaction = additivity
  - Synergy, antagonism = response greater, less than predicted under additivity
- Dose additivity = chemicals interacting as if they were dilutions of one another
  - Does not require same shape of dose-response
  - Does not require common mechanism of action
  - Combinations of sub-threshold doses may be active

Berenbaum, *J. Theor. Biol.* 114:413-431,1985

# Isobolographic Approach

- Classic method of describing dose-additivity
  - Isobols of equi-effective doses
  - Requires multiple dose-response determinations with different dose combinations of each chemical
  - Data intensive

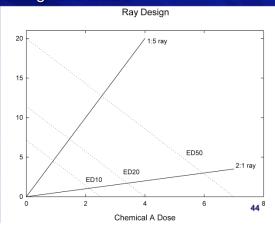




# Ray Approach

- Dose-response along ray of mixture with fixed proportions of components
- Uses individual chemical dose-response curves plus mixture curve
- Inferences limited to mixing ratio tested

Isobol = curve fitted to points with fixed response Ray = curve fitted to points with fixed ratios



Advantages of Ray Designs

- Useful for any number of chemicals
- Economical and efficient design to test for interactions
- Provides statistical test of additivity
- Mixture of study can be tailored to address experimental question(s)
- Hypothesis-testing as well as -generating

# General Methodology for Additivity Analysis using Ray Designs

- Dose-response model is fit to single chemical data
- Additivity model (predicted) along fixed ray is generated based on single-chemical data and mixing ratio of each chemical
- Dose-response model (observed) is fit to experimental mixture data
- Fitted models (predicted vs observed) are tested for departure from additivity, e.g.,
  - Equality of parameters for experimental and additivity model
  - Experimental model fits within confidence limits of predicted model
  - Equality of statistically derived thresholds

Considerations Using Ray Designs

- Adequately characterize shape of individual and mixture dose response
- Dose-response characteristics
  - Maximal responses
  - Slopes
- Focus on chemical selections, combinations, and mixing ratios of interest
- Also important: dose-rate, sequence and route of administration

# Mixture of 5 Organophosphorus **Pesticides**

- Why OPs?
  - · Widely used pesticides, still
  - Potential for human exposure to multiple OPs through use on foods and other commercial crops, pets, garden, home
  - · Common mode of action (inhibition of acetylcholinesterase)
  - · Epidemiological studies implicate OPs for neurological adverse effects not predicted by individual chemicals
- Why 5 OPs?
  - Monitoring data show 99% of food products have ≤5 pesticide residues (USDA Pesticide Data Program)

# Mixture of 5 Organophosphorus Pesticides

- Which OPs?
  - Relevance based on potential human exposures, usage patterns, food residues
  - Overlapping geographical usage
  - Chlorpyrifos, diazinon, malathion, acephate, dimethoate
    - > These were among top 10 OPs in use in US
- What ratios?
  - Proportions based on predicted dietary exposures estimated by Dietary Exposure Estimate Model (DEEM™)

# **Environmentally Relevant** Proportions (Ratios)

Dose ratios

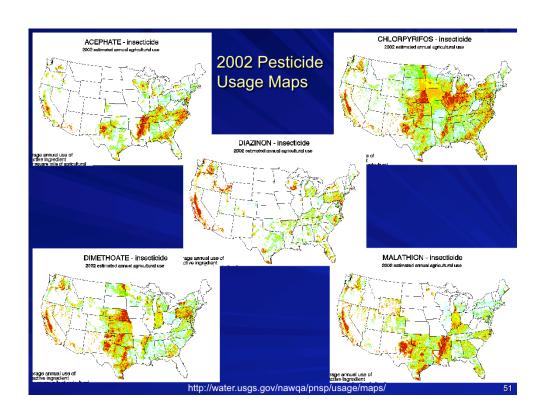
0.031 (chloryprifos) 0.002 (diazinon) 0.825 (malathion)

0.04 (acephate)

0.102 (dimethoate)

Chlorpyrifos DEEM values

	1	,				
POPULATION	95% EXPOSURE		99% EXPOSURE		99.9% EXPOSURE	
	mgs/kg/day	percent of aPAD	mgs/kg/day	percent of aPAD	mgs/kg/day	Percent of aPAD
U. S. Population	0.000019	0.4	0.000112	2.3	0.000790	15.8
All infeats	0.000013	2.5	0.000065	13.0	0.000645	129
Nursing Infants	0.000010	2.0	0.000068	13.7	0.001148	230
Non-nursing Infants	0.000014	2.7	0.000065	13.1	0.000482	96.4
Children 1 - 6 years old	0.000048	9.6	0.000240	48.1	0.001808	362
Children 7 - 12 years old	0.000034	6.9	0.000194	38.9	0.001357	272



Mixture of Organophosphorus
Pesticides

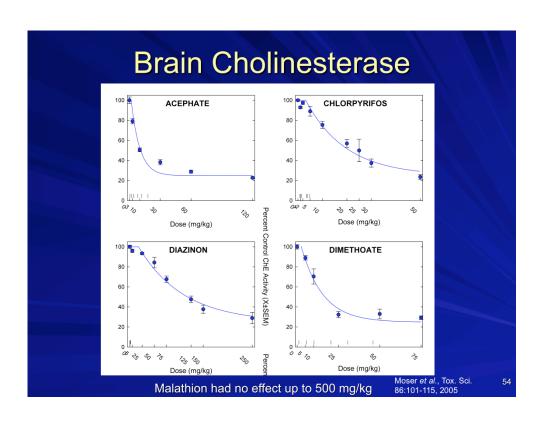
- Would we expect dose-additivity?
  - Default assumption, but...
  - Old literature (50's, 60's) shows non-additive interactions in about half of binary OP combinations
  - Well-known OP interactions with malathion due to inhibition of detoxifying enzymes
  - Several potential kinetic sites for interactions
  - Recent data suggest non-additivity dependent on sequence of administration

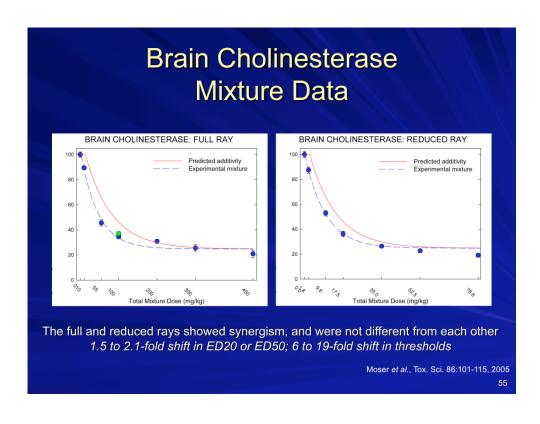
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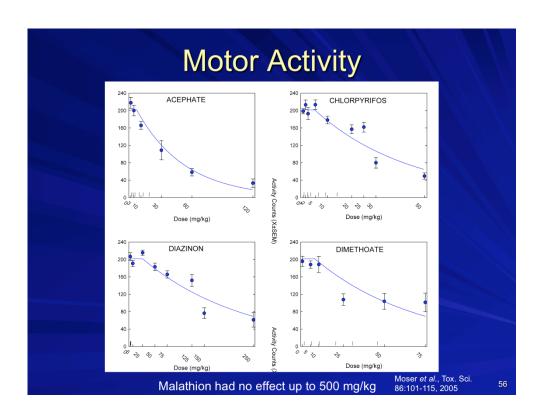
# Approach

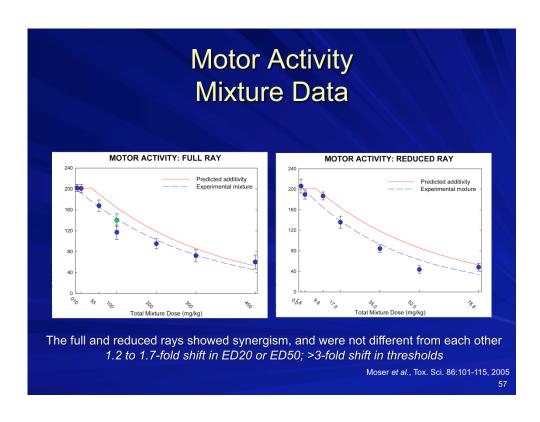
- Use multiple endpoints to fully characterize interactions
  - Brain and blood ChE inhibition, motor activity, gait score, tail pinch response
- Evaluate influence of malathion in the mixture by removing it (reduced ray)
- Acute oral dosing, tested at 4 hr (time of peak effect), male

peak effect), male Long-Evans rats, n=10/dose Adult, PND17









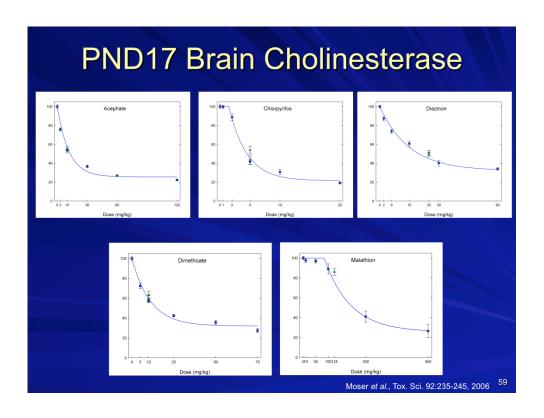
# **Adult Mixture Summary**

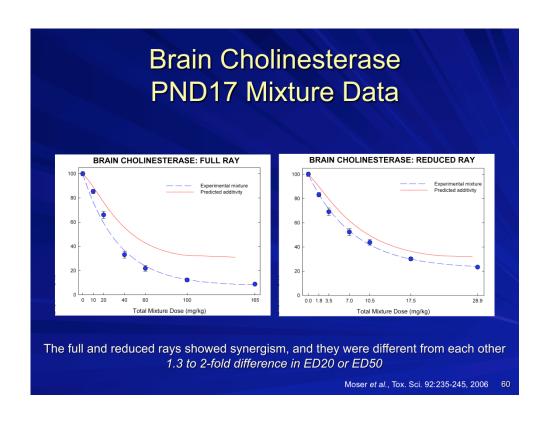
Endpoint	Full Ray*	Reduced Ray*	Full vs. Reduced**	ED20/50 Difference
Brain ChE	Yes	Yes	No	1.5-2.1X 6-19X threshold shift
Blood ChE	Yes	Yes	Yes	1.2-1.9X
Motor Activity	Yes	Yes	No	1.2-1.7X >3X threshold shift
Gait Score	Yes	No	Yes	1.6-1.7X
Tail Pinch Response	No	No		

<sup>\*</sup> significantly different from additivity, greater-than-additive (synergism)
\*\* significant difference between full and reduced rays

Moser et al., Tox. Sci. 86:101-115, 2005 58

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# **PND17 Mixture Summary**

Endpoint	Full Ray*	Reduced Ray*	Full vs. Reduced**	ED20/50 Difference
Brain ChE	Yes	Yes	Yes	1.5-2.1X
Blood ChE	Yes	Yes	Yes	1.7-2.3X
Motor Activity	Yes	No	Yes	1.3-2.6X
Gait Score	Yes	Yes	Yes	2.2-3X
Tail Pinch Response	Yes	No	Yes	3.5X

<sup>\*</sup> significantly different from additivity, greater-than-additive (synergism)
\*\* significant difference between full and reduced rays

Moser et al., Tox. Sci. 92:235-245, 2006

Summary of OP Mixtures

- Greater-than-additive interactions (i.e., synergism) detected with both mixtures at both ages
  - Interactions depended on endpoint
  - Significant differences at low end of doseresponse (threshold)
  - Comparing the reduced to the full ray indicated an influence of malathion on most endpoints
    - > Degree of influence depended on endpoint

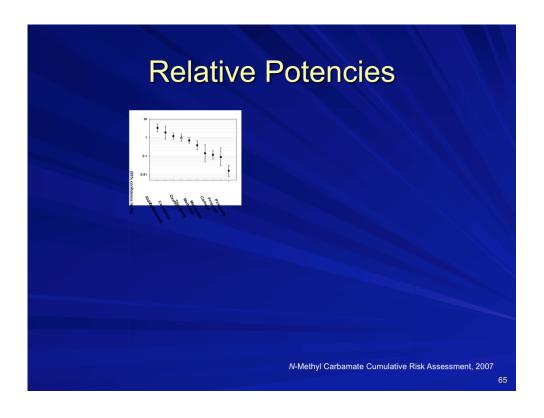
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# Mixture of 7 *N*-Methyl Carbamate Pesticides

- Why carbamates?
  - Broad agricultural and residential uses
  - Exposures from food residues, drinking water, and home – dermal, inhalation, oral
  - Common mode of action (inhibition of acetylcholinesterase)
- Why 7 carbamates?
  - Of 10 carbamates being regulated, these 7 had high contribution to cumulative risk assessment

# Mixture of 7 N-Methyl Carbamate Pesticides

- Which carbamates?
  - High usage and contribution to cumulative risk assessment
  - Carbaryl, carbofuran, formetanate HCl, methiocarb, methomyl, oxamyl, propoxur
- What ratios?
  - Proportions based on relative potencies using BMD10 (10% brain ChE inhibition)
  - Proportions based on California database of tonnage sold in 2005
    - > Surrogate for total (aggregate) exposures



## California Database

Pestici de Use Reporting

Page 1 of 1



Gov Pesticide Regulation

### Pesticide Use Reporting (PUR)

California's pesticice use reporting program is recognized as the most comprehensive in the world. In 1990, California became the first state to require full reporting of agricultural posicide use in response to demands for more realistic and comprehensive additional use data. Under the program, all agricultural posicide use must be reported monthly to the country agricultural commissioner, who in turn, reports the data in 3PR.

California has a broad legal definitor of "agricultural use" so the reporting requirements include pesticida applications to parks, gplf couses, cometeres, "argeland, pastures and along nadiscle and rainoad rights-of-way, in addition," all postbarrest pesticide bestments of agricultural commodities must be reported, alongwith all pesticide reatments in pour ty and fish production, as well as some livescock applications. The primary exceptions to the full use reporting requirements are home and garden use and most industrial and institutional uses.

- Laws governing posticide use reporting (Scroll to Food and Agricultura Code section 14011.5 et sequinale...)
- » Pesticide use reporting regulations (3 CCR sections 6624 6628)
- \* Pesticide use reporting of field furnicant applications
- » Forms for pesticide use reporting

\*\* California Pesticide Information Portal - Generate custom zed information from DPR's Pesticide Use Report Database

Summaries of Pesticide Use Data (1509 to present - note that in 1909, full use reporting requirements were not in effect)

Click arrow to select year.

Use DER'S Publication Order Form (PDF, 170-db) to order copies of the printed viers or of the annual Summaries of Pesticide Use Data or CDs of the complete distallates.

http://www.cdpr.ca.gov/docs/pur/purmain.htm

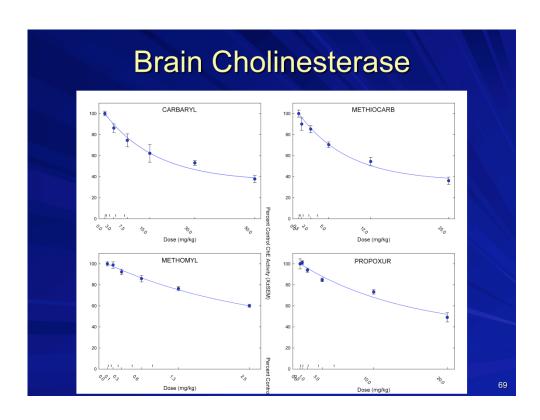
### **Carbamate Proportions** CA Environmental Relative Potency **Factor Mixture** Mixture Carbaryl .42 Methomyl 41 Propoxur .29 .39 Carbaryl Methiocarb .20 .13 Methomyl Oxamyl 05 Carbofuran .04 Formetanate .02 .03 Formetanate Oxamyl .01 Methiocarb .003 Carbofuran .01 Propoxur .002

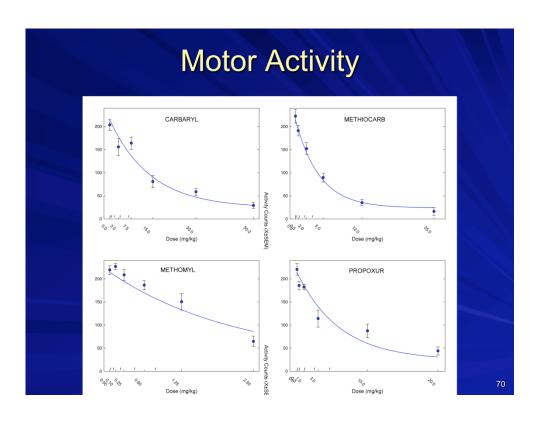
# Approach

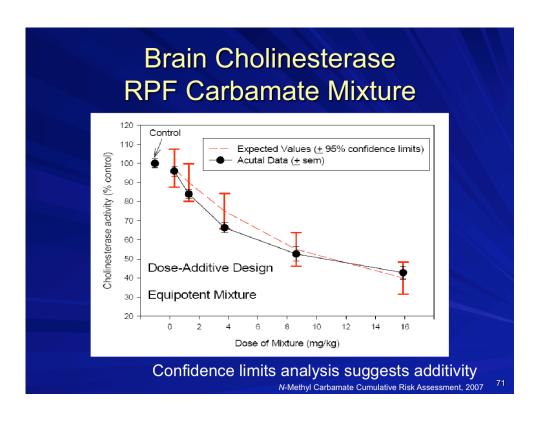
- Use several endpoints to characterize interactions
  - Brain and RBC ChE inhibition, motor activity
- Evaluate influence of mixing ratios
- Acute oral dosing, tested at 40 min (time of peak effect), male Long-Evans rats,

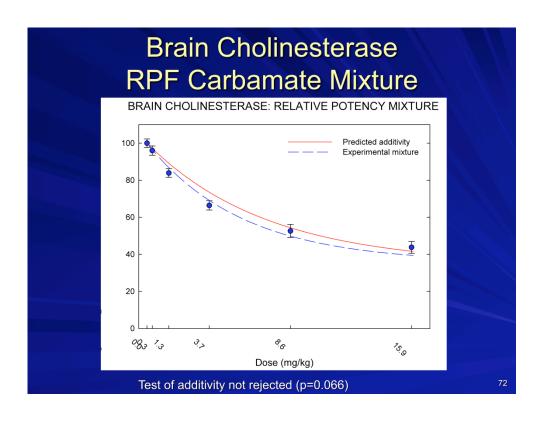
n=10/dose Adult, (PND17)

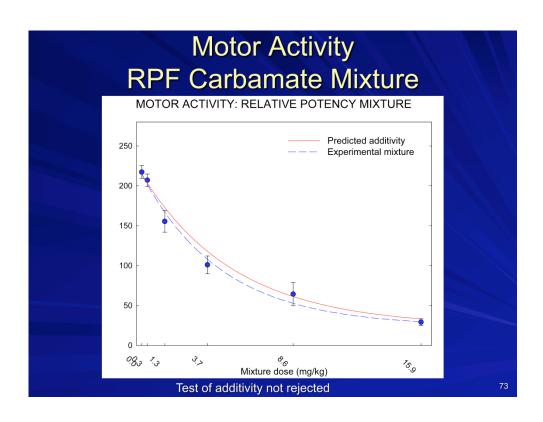


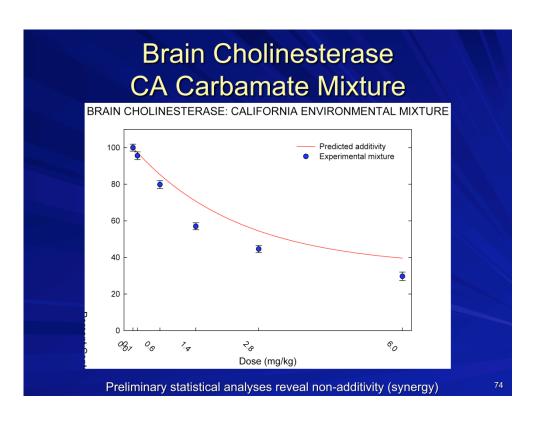


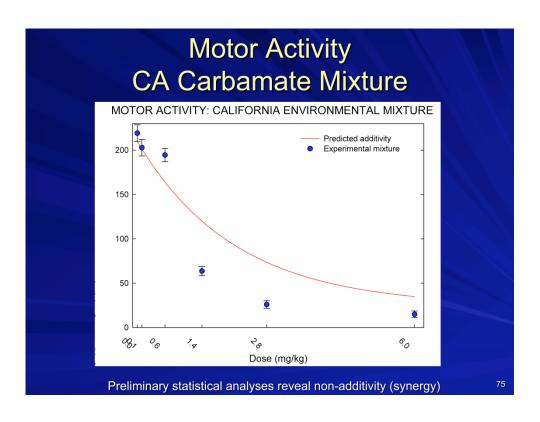












Summary of 7-Carbamate Mixtures

- Additivity (zero interaction) with mixture ratios based on relative potency factors
- Greater-than-additive interactions (e.g., synergy) with mixture ratios based on amounts sold in California
- Differences in outcome based on mixing ratios of components

## Other Studies, Similar Methodology

- 4 DBPs producing hepatotoxicity (mice)<sup>1</sup>
  - Ratio based on average seasonal proportion of 35 water treatment facilities
  - No departure from additivity
- 18 PHAHs decreasing serum T4 (rats)<sup>2</sup>
  - · Ratio based on average concentrations found in human breast milk and food sources
  - Concentrations in range of human body burdens
  - · Synergy emerged as dose increased
- 6 synthetic estrogens producing estrogenic actions (*in vitro* ER-α reporter gene and in vivo uterotrophic assays)3
  - With and without phytoestrogens
  - · Ratios based on relative potencies
  - Interactions depended on concentrations and components of mixture
    - <sup>1</sup> Gennings et al., J Agr Biol Environ Stat, 2:198-211, 1997

    - <sup>2</sup> Crofton et al., Env Health Perspec 113:1549-1554, 2005 <sup>3</sup> Charles et al., Tox Appl Pharm 218:280-288, 2007

# Considerations for Environmentally Relevant Mixture Research

- Appropriate experimental design and statistical analyses
  - Specify dose- or response-additivity hypotheses, design and analyze experiment appropriately
- Strategically select specific exposure scenarios
  - Potentially worrisome chemicals, *e.g.*, high-use, environmentally persistent
  - Rational mixing ratios, e.g., reflecting potential or known human exposure
  - Site-specific combinations and ratios
- Use of fixed-ratio ray designs can provide efficient and focused research of mixtures

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# Cadillac of Mixture Assessments

- Quantitative component-based mixtures risk assessment that includes:
  - Exposure scenarios reflective of human exposures
  - Environmental relevance in composition of mixture
  - Defined dose-response data addressing common toxic pathway
  - Experimental data on actual mixtures
  - Evaluation of additional influences, *e.g.*, age, gender, *etc.*
  - Biologically based modeling (e.g., PBPK) to describe interactions

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# Volkswagen of Mixture Assessments

- Less data-intensive approaches for (partially) defined mixtures
- Given exposure data and some measure of acceptable level (e.g., RfD/C)
  - Hazard quotient (HQ) or index (HI)
  - Target organ toxicity dose (TTD)
  - Toxicity equivalence factor (TEF)
- Given only composition
  - Analysis of sufficiently similar mixtures

# Challenges

- Determination of key events of components
  - Target organ and toxicity
- No complete dose-response data of components
  - Some statistical methods address this
- Not all components are identified
  - · Evaluate data for similar mixture
  - Evaluate known partial mixture with and without undefined fraction
- Exposure and response
  - Chronicity
  - Timing
  - Aggregated routes
  - Dose-dependent transitions

These are research areas being proposed in NHEERL



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