

# Fact or Fiction?



**Jack W. Dini**  
1537 Desoto Way  
Livermore, CA 94550  
E-mail: jdini@attbi.com

## Particles & Exposure

In terms of environmental regulation, which PM<sub>0.8</sub> concentration is more toxic?

- a mg/m<sup>3</sup> of sulfuric acid, or
- a mg/m<sup>3</sup> of zinc sulfate

The answer: there is no difference. Never mind that the sulfuric acid particle provides more than five times the relative irritant potency as shown in Table 1. This table, from Mary Amdur and her colleagues, reveals that the relative irritant potency of sulfates in animal testing spans two orders of magnitude.<sup>1</sup> Amdur *et al.* state, "The irritant potency of the sulfate species varies so widely that the term 'suspended sulfate' is toxicologically meaningless." However, as David Mage notes, "The EPA PM standards and the California sulfate standard treat an exposure to each PM sulfate, at the same AD (aerodynamic diameters), concentration, and averaging time, as having exactly the same human health effect."<sup>2</sup>

An article by David Mage with the catchy title, "A particle is not a particle is not a PARTICLE," in a recent epidemiology journal addresses this issue.<sup>2</sup> He says the following: "Since its inception, the U.S. Environmental Protection Agency (EPA)

has, by necessity, been operating as if the health effects of ambient particulate matter (PM) are independent of the PM chemical composition, and only a function of the particles' aerodynamic diameters (AD), the mass concentration of the particles, and the

averaging time of the exposure to the ambient PM. Although this may originally have been an expedient and practical executive decision for standard setting, in the absence of specific mixture toxicity composition information, it has spawned innumerable papers by authors who write as if they actually believe that all equal mass concentrations of ambient PM of identical AD have the identical toxicity." He goes on to point out, "At the same low dose units of ug/kg body weight/day, some substances can be inert (NaCl), some can be acutely toxic (NaCN), and some can be chronically toxic (NaF). Although this concept is well known to most toxicologists and apparently to most, if not all, air pollution health scientists, the EPA currently persists in treating all ambient PM species of a particular AD size range, save for water, as having the identical toxicity, whether they are like NaCl, NaCN, or NaF."<sup>2</sup>

Mage concludes by suggesting that perhaps it is time for the EPA to consider

**Table 1**  
**Relative Irritant Potency of Sulfates**  
(0.1-0.8  $\mu$ m mass median diameter)<sup>a</sup>

Species of sulfate	Relative irritant potency
Sulfuric acid	100
Zinc ammonium sulfate	33
Ferric sulfate	26
Zinc sulfate	19
Ammonium sulfate	10
Ammonium bisulfate	3
Cupric sulfate	2
Ferrous sulfate	0.7
Sodium sulfate <sup>b</sup>	0.7

a. Mary O. Amdur, John Bayles, Valerie Ugro and Dwight W. Underhill, "Comparative Irritant Potency of Sulfate Salts," *Environmental Research*, **16**, 1 (1978)

b. Mass median diameter of 0.1  $\mu$ m.

**Table 2**  
**Dose Effectiveness Varies as Much as Toxicity<sup>a</sup>**

Source	Grams inhaled per tonne emitted
US coal power plant	1
Vehicles	12
Neighborhood sources	100
Stove vented outdoors	600
Stove vented indoors	4,500
Cigarette-mainstream	1,000,000

a. Kirk R. Smith, "Place makes the poison," *Journal of Exposure Analysis and Environmental Epidemiology*, **12**, 167 (2002)

