

## Holly Dixon

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**From:** Stanek, John <Stanek.John@epa.gov>  
**Sent:** Wednesday, May 22, 2024 11:19 AM  
**To:** Dong, Qiaoxiang@CDPR; GOECKNER Apollonia \* DEQ; 'John Budroe'; 'Jeff Fowles'; susan.tilton@oregonstate.edu; 'John Vandenberg, Ph.D.'  
**Cc:** Holly Dixon; Farrer David G; GISKA JR \* DEQ; MACMILLAN Susan \* DEQ  
**Subject:** RE: ATSAC Meeting 3: Manganese- Meeting Minutes

**Follow Up Flag:** Follow up  
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I agree and have a few additional thoughts.

In my opinion, the additional information does still not provide enough justification for not applying a duration adjustment to account for extrapolation from a discontinuous exposure regimen to a continuous 24-hr reference value. (That is, whether tissue dose/effects resulting from a 6-hr exposure to 1.5 mg/m<sup>3</sup> would also result from a 24-hr exposure to 0.375 mg/m<sup>3</sup> or some other concentration.)

I would think the Perry model could have addressed this issue by determining an HEC for 24-hrs by incorporating information from the other models cited where tissue NOAELS were estimated. (Maybe it does but it is not clearly presented?).

In addition, I found it interesting as cited in Table 1 of Perry that TCEQ applied a modified (ten Berge) Cxt to calculate a 1-hr value (using the same Dorman study LOAEL of 1.5 mg/m<sup>3</sup> for respiratory effects). However, they determined not to apply it to extrapolate to 24-hrs – this appears methodologically inconsistent to me and is the one of the bases for this issue. With the appropriate justification, applying the same modified Cxt to extrapolate to 24 hrs would result in an adjusted POD of 0.94 mg/m<sup>3</sup> and a reference value of 3.14 ug/m<sup>3</sup> (using UF of 300). Anyway just an observation.

Thank you,

John

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**From:** Dong, Qiaoxiang@CDPR <Qiaoxiang.Dong@cdpr.ca.gov>  
**Sent:** Wednesday, May 15, 2024 2:08 PM  
**To:** GOECKNER Apollonia \* DEQ <Apollonia.GOECKNER@deq.oregon.gov>; 'John Budroe' <jdbudroe@gmail.com>; 'Jeff Fowles' <jfowles101@gmail.com>; Stanek, John <Stanek.John@epa.gov>; susan.tilton@oregonstate.edu; 'John Vandenberg, Ph.D.' <john.vandenberg@duke.edu>  
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**Subject:** RE: ATSAC Meeting 3: Manganese- Meeting Minutes

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The additional information only addressed the pharmacokinetic (PK) difference but not the pharmacodynamic (PD) difference between the continuous 24h exposure and the 6hr/d, 5d/wk for 3 weeks exposure. As I commented earlier, only when both PK **AND** PD indicate no differences between these two exposure scenarios, then it is ok not to do time adjustment. Therefore, my opinion stays same as before.

Thank you,  
Daisy

Qiaoxiang (Daisy) Dong, PhD  
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**Subject:** RE: ATSAC Meeting 3: Manganese- Meeting Minutes

**EXTERNAL:**

Hi ATSAC Members,

Thank you for the feedback on the meeting minutes. We integrated all the feedback we received, and the final meeting minutes are now posted [online here](#).

We also compiled all the ATSAC manganese TRV worksheets ([online here](#)) and ATSAC responses to the follow-up manganese questions ([online here](#)).

**New Update:** We received an additional email from the petitioner on May 7<sup>th</sup>, which included a report from ToxStrategies regarding the time adjustment to the proposed manganese TRV. These additional items from the petitioner are [available online](#).

**Request:** Does any of the additional information from the petitioner influence your opinion on the TRV for acute exposure (24-hour) to manganese? Let us know if you have any follow-up questions for ToxStrategies. We would appreciate to hear your input by **COB Wednesday, May 22<sup>nd</sup>**.

Thanks again,  
ATSAC Governance Team



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**From:** GOECKNER Apollonia \* DEQ

**Sent:** Friday, May 3, 2024 4:58 PM

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**Subject:** ATSAC Meeting 3: Manganese- Meeting Minutes

Hello ATSAC Members,

Thank you all so much for your feedback on the additional information we received after the Manganese meeting.

Please see the attached word document with the meeting minutes. Please be sure to look at the portions of the minutes where your own comments are summarized and check them for accuracy. We also have 2 comments included with some clarifying questions for John Budroe and John Stanek.

Please confirm that this looks accurate, or let us know if we need to make any changes by next **Friday, May 10**.

If you have any questions, let us know.

Best,  
ATSAC Governance Team



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