# **CHAPTER 2. HEALTH EFFECTS**

#### 2.1 INTRODUCTION

The primary purpose of this chapter is to provide public health officials, physicians, toxicologists, and other interested individuals and groups with an overall perspective on the toxicology of BCME. It contains descriptions and evaluations of toxicological studies and epidemiological investigations and provides conclusions, where possible, on the relevance of toxicity and toxicokinetic data to public health. When available, mechanisms of action are discussed along with the health effects data; toxicokinetic mechanistic data are discussed in Section 3.1.

A glossary and list of acronyms, abbreviations, and symbols can be found at the end of this profile.

To help public health professionals and others address the needs of persons living or working near hazardous waste sites, the information in this section is organized by health effect. These data are discussed in terms of route of exposure (inhalation, oral, and dermal) and three exposure periods: acute ( $\leq$ 14 days), intermediate (15–364 days), and chronic ( $\geq$ 365 days).

As discussed in Appendix B, a literature search was conducted to identify relevant studies examining health effect endpoints. Figure 2-1 provides an overview of the database of studies in humans or experimental animals included in this chapter of the profile. These studies evaluate the potential health effects associated with inhalation, oral, or dermal exposure to BCME, but may not be inclusive of the entire body of literature.

Levels of significant exposure (LSEs) for each route and duration are presented in tables and illustrated in figures. Animal inhalation studies are presented in Table 2-1 and Figure 2-2; no oral or dermal data were identified for BCME.

The points in the figures showing no-observed-adverse-effect levels (NOAELs) or lowest-observed-adverse-effect levels (LOAELs) reflect the actual doses (levels of exposure) used in the studies. LOAELs have been classified into "less serious" or "serious" effects. "Serious" effects are those that evoke failure in a biological system and can lead to morbidity or mortality (e.g., acute respiratory distress or death). "Less serious" effects are those that are not expected to cause significant dysfunction or death, or those whose significance to the organism is not entirely clear. ATSDR acknowledges that a considerable amount of judgment may be required in establishing whether an endpoint should be classified as a NOAEL, "less serious" LOAEL, or "serious" LOAEL, and that in some cases, there will be insufficient

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data to decide whether the effect is indicative of significant dysfunction. However, the Agency has established guidelines and policies that are used to classify these endpoints. ATSDR believes that there is sufficient merit in this approach to warrant an attempt at distinguishing between "less serious" and "serious" effects. The distinction between "less serious" effects and "serious" effects is considered to be important because it helps the users of the profiles to identify levels of exposure at which major health effects start to appear. LOAELs or NOAELs should also help in determining whether or not the effects vary with dose and/or duration, and place into perspective the possible significance of these effects to human health. Levels of exposure associated with cancer (Cancer Effect Levels, CELs) of BCME are indicated in Table 2-1 and Figure 2-2.

A User's Guide has been provided at the end of this profile (see Appendix C). This guide should aid in the interpretation of the tables and figures for LSEs and MRLs.

The health effects of BCME have been evaluated in occupational exposure studies and in animal studies. As illustrated in Figure 2-1, most of the health effects data come from animal studies mostly examining a limited number of health endpoints and from occupational cancer studies. In addition to the studies summarized in Figure 2-1, five studies have examined acute lethality following inhalation, oral, or dermal exposure. Animal data are available for most health effect categories, but these data are mostly derived from a single intermediate-duration inhalation study that identified NOAEL values for most effects. It is noted that no studies examined reproductive function, immune function, or developmental toxicity.

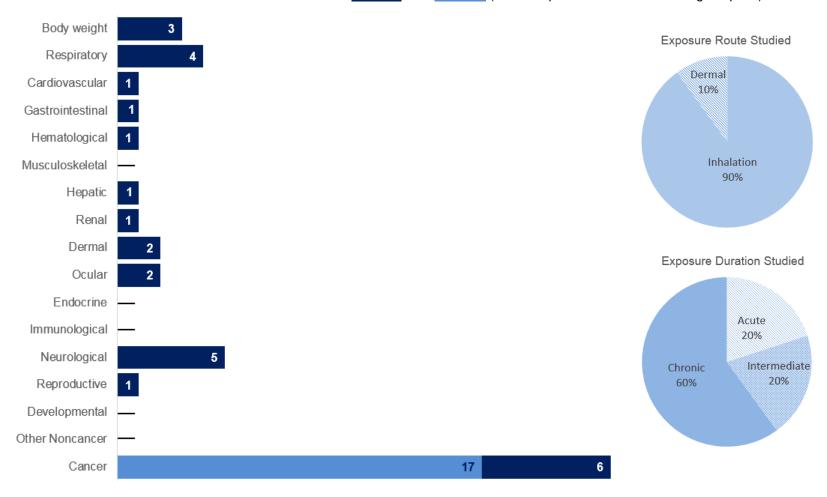
The available human and animal studies suggest the following sensitive targets of toxicity:

- **Respiratory Endpoints:** Respiratory distress, tracheal and bronchial hyperplasia and squamous metaplasia, and pneumonitis have been observed in laboratory animals.
- **Nervous System Endpoint:** At lethal concentrations, subarachnoid hemorrhage and extreme irritability have been observed in laboratory animals.
- Cancer Endpoint: Lung cancer has been reported in occupational exposure studies. Nasal and lung tumors have been reported in rats and mice following intermediate-duration inhalation exposure.

Figure 2-1. Overview of the Number of Studies Examining Bis(Chloromethyl)Ether Health Effects

Most studies examined the potential cancer, nervous system, and respiratory effects of bis(chloromethyl)ether

More studies evaluated health effects in animals than humans (counts represent studies examining endpoint)



<sup>\*</sup>Includes studies discussed in Chapter 2. A total of 30 studies (including those finding no effect) have examined toxicity; most studies examined multiple endpoints.

		Table 2-	1. Levels	of Signific	ant Expo	sure to Bis	s(Chlorome	ethyl)Ethe	r – Inhalation
Figure key <sup>a</sup>	Species (strain) No./group	Exposure parameters	Doses (ppm)	Parameters monitored	Endpoint	NOAEL (ppm)	Less serious LOAEL (ppm)	Serious LOAEL (ppm)	Effect
ACUT	ACUTE EXPOSURE								
1	Rat (Sprague-	7 hours (allowed to	0, 0.7, 2.1, 6.9, 9.5	HP, LE	Death			2.1	Decreased lifespan, 36 days compared to 462 days in controls
	Dawley) 25 M	recover over lifetime)			Resp		0.7		Increased relative lung weight at ≥0.7 ppm; increased incidence of tracheal epithelial hyperplasia at 0.7 ppm; tracheal and bronchial hyperplasia and bronchial squamous metaplasia at 2.1 ppm
	et al. 1975								
2	Rat (Sprague- Dawley) 50 M	1, 3, or 10 days 6 hours/day	1	LE, CS	Death			1	Decreased lifespan in rats exposed for 3 or 10 days (168 and 21 days, respectively) compared to controls (462 days)
					Neuro			1	Subarachnoid hemorrhage and extreme irritability in rats exposed for 10 days
Drew	et al. 1975								
3	Rat (Sprague- Dawley) M	7 hours	0.94, 4.6, 6.2, 7.3, 9, 19, 74	LE	Death			7.0	LC <sub>50</sub>
Drew	Drew et al. 1975								
4	Hamster (Golden Syrian) M	7 hours	0.94, 4.6, 6.2, 7.3, 9, 19, 74	LE	Death			7.0	LC <sub>50</sub>
Drew	Drew et al. 1975								

#### Table 2-1. Levels of Significant Exposure to Bis(Chloromethyl)Ether – Inhalation Less Species serious Serious Figure (strain) Exposure **Parameters** NOAEL LOAEL LOAEL Doses Effect key<sup>a</sup> No./group parameters (ppm) monitored Endpoint (ppm) (ppm) (ppm) 0, 0.7, 2.1, HP, LE 5 7 hours 2.1 Decreased lifespan, 68 days Hamster Death (Golden (allowed to 6.9, 9.5 compared to 675 days in controls Syrian) recover over Increased relative lung weight at Resp 0.7 25 M lifetime) ≥0.7 ppm; increased incidence of pneumonitis at 0.7 ppm: tracheal and bronchial hyperplasia and hyperplasia with atypia at 2.1 ppm Drew et al. 1975 Decreased lifespan in hamsters LE, CS 6 1, 3, or 1 1 Hamster Death exposed for 3 or 10 days (471 and (Golden 10 days 137 days, respectively) compared Syrian) 6 hours/day 50 M to controls (675 days) 1 Extreme irritability in hamsters Neuro exposed for 10 days Drew et al. 1975 6 hours 5.3 $LC_{50}$ 7 Mouse 2.7 - 10.6LE Death (A/ Heston) Leong et al. 1971 **INTERMEDIATE EXPOSURE** LE, CS 8 Rat 30 days 1 Death 1 Decreased lifespan (23 days) (Sprague- 6 hours/day compared to controls (462 days) Dawley) Subarachnoid hemorrhage and Neuro 1 50 M extreme irritability Drew et al. 1975 9 Rat 4 weeks Cancer 0.1 CEL: nasal and lung tumors 5 days/week: 6 hours/day

Kuschner et al. 1975

#### Table 2-1. Levels of Significant Exposure to Bis(Chloromethyl)Ether – Inhalation Less Species serious Serious Figure (strain) LOAEL Exposure **Parameters** NOAEL LOAEL Doses No./group parameters (ppm) Effect (ppm) monitored Endpoint (ppm) (ppm) 10 BC, HP, BW Death Increased mortality during the post-Rat 6 months 0. 0.001. 0.1 (Sprague- 6 hours/day; 0.01, 0.1 exposure period 5 days/week Dawley) Bd wt 0.1 120 M 0.1<sup>b</sup> Resp Cardio 0.1 Gastro 0.1 Hemato 0.1 Hepatic 0.1 Renal 0.1 Endocr 0.1 Ocular 0.1 0.1 Neuro Repro 0.1 0.1 CEL: nasal Cancer esthesioneuroepithelioma tumors Leong et al. 1981 82 exposure 0, 1 LE, BW, HP Death 37/50 animals died compared to 1 11 Mouse (A/ 6/50 in controls days Heston) 6 hours/day, Weight loss; magnitude not Bd Wt 1 5 days/week 50 M reported Resp 1 Respiratory distress Cancer No increases in the incidence of lung tumors Leong et al. 1971 0, 0.001, BC, HP 12 Mice 6 months Bd Wt 0.1 (Ha/ICR) 6 hours/day; 0.01, 0.1 Cancer 0.1 Increase in pulmonary adenomas in 120 M 5 days/week mice dying post-exposure

Leong et al. 1981

	Table 2-1. Levels of Significant Exposure to Bis(Chloromethyl)Ether – Inhalation								
•	Species (strain) No./group	Exposure parameters	Doses (ppm)	Parameters monitored	Endpoint	NOAEL (ppm)	Less serious LOAEL (ppm)	Serious LOAEL (ppm)	Effect
13	Hamster (Golden	30 days 6 hours/day	1	LE	Death			1	Decreased lifespan (42 days) compared to controls (675 days)
_	Syrian) 50 M et al. 1975				Neuro			1	Subarachnoid hemorrhage and extreme irritability

<sup>&</sup>lt;sup>a</sup>The number corresponds to entries in Figure 2-2.

BC = biochemistry; Bd Wt or BW = body weight; Cardio = cardiovascular; CEL = cancer effect level; CS – clinical signs; LC<sub>50</sub> = lethal concentration, 50% mortality; Endocr = endocrine; Gastro = gastrointestinal; Hemato = hematological; HP = histopathology; LE = lethality; LOAEL = lowest-observed-adverse-effect level; Neuro = neurological; NOAEL = no-observed-adverse-effect level; Resp = respiratory

bUsed to derive intermediate MRL; concentration adjusted for intermittent exposure, converted to an equivalent concentration in humans, and divided by an uncertainty factor of 100 (10 for extrapolation from animals to humans, and 10 for human variability), resulting in an MRL of 0.0003 ppm.

Figure 2-2. Levels of Significant Exposure to Bis(Chloromethyl)Ether – Inhalation

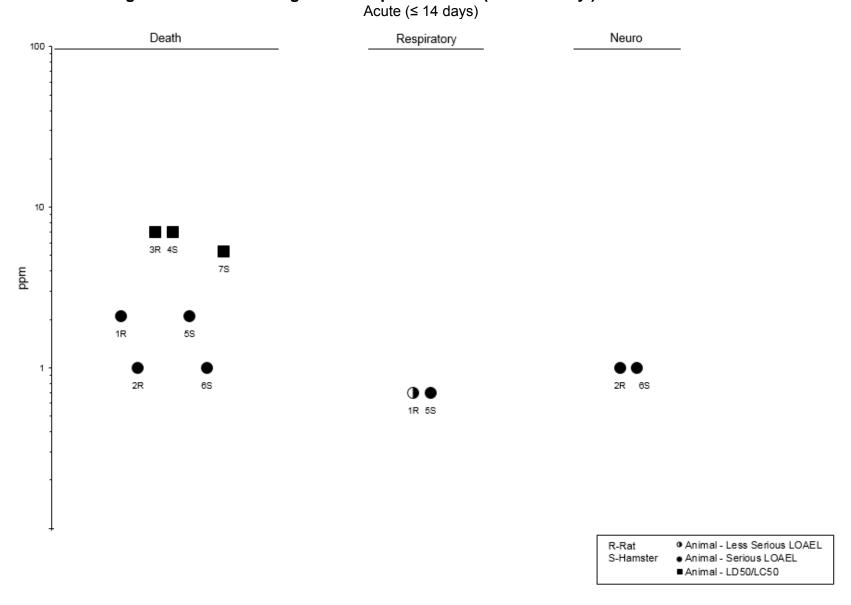
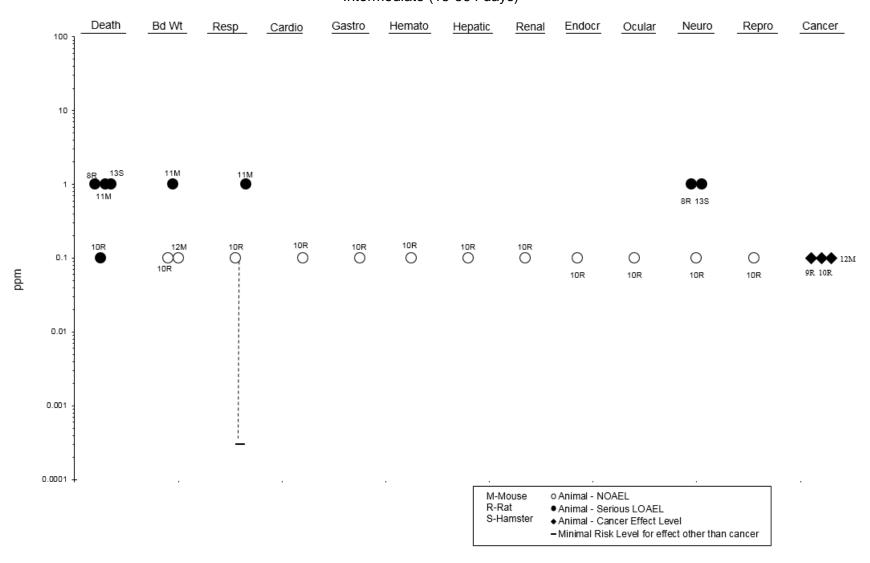


Figure 2-2. Levels of Significant Exposure to Bis(Chloromethyl)Ether – Inhalation Intermediate (15-364 days)



#### 2.2 DEATH

No reports of acute human lethality due to inhalation of BCME were located. Increased mortality from cancer has been observed in humans exposed to BCME in the workplace, as discussed in detail in Section 2.19.

In rats and hamsters, the acute inhalation  $LC_{50}$  for a 7-hour exposure has been estimated to be 7 ppm (Drew et al. 1975). The cause of death was acute lung irritation that resulted in congestion, edema, and hemorrhage. A similar  $LC_{50}$  of 5.3 ppm for a 6-hour exposure was estimated in mice (Leong et al. 1971). A single 7-hour exposure to 0.7 ppm did not cause acute or delayed mortality in rats or hamsters, but a single exposure to 2.1 ppm led to marked reduction in life span in both species (Drew et al. 1975). Repeated exposures to 1 ppm led to a duration-dependent increase in mortality. In rats, 3, 10, or 30 exposures to 1 ppm led to a median lifespans of 168, 21, or 23 days; lifespan in the controls was 462 days. Similar decreases in lifespan were also observed in hamsters (Drew et al. 1975). Exposure to concentrations as low as 0.1 ppm caused increased mortality in the post-exposure period in rats when exposure was extended to 6 months (Leong et al. 1981), primarily because of the occurrence of nasal tumors (see Section 2.19).

No studies were located regarding acute lethality in humans following oral exposure to BCME. The acute oral LD<sub>so</sub> in rats for undiluted BCME is estimated to be 280 mg/kg (Union Carbide 1968).

The estimated LD<sub>50</sub> for a single dermal application of undiluted BCME to rabbit skin is 370 mg/kg (Union Carbide 1968). No other estimates of lethal dermal doses were located.

### 2.3 BODY WEIGHT

There are limited data on body weight following inhalation exposure to BCME. No alterations in body weight gain were observed in rats or mice exposed to 0.1 ppm for 6 months (Leong et al. 1981). Weight loss (magnitude not reported) was observed in mice exposed to 1 ppm for 82 days (Leong et al. 1971).

#### 2.4 RESPIRATORY

In humans, exposure to vapors of chloromethyl methyl ether (CME) containing BCME as a contaminant led to increased incidence of chronic bronchitis, manifest as chronic cough and impaired respiratory function (Weiss 1976; Weiss and Boucot 1975). Since CME is itself a lung irritant, it is not possible to determine the degree to which BCME may have contributed to the observed respiratory effects.

Studies in laboratory animals also demonstrate the respiratory toxicity of BCME. At lethal concentrations, lung congestion, edema, and hemorrhage in rats and hamsters have been observed (Drew et al. 1975). A single exposure to ≥0.7 ppm resulted in increases in lung weight, pneumonitis, and tracheal and bronchial hyperplasia (Drew et al. 1975). Exposure of mice to BCME at 1 ppm for 82 days caused marked respiratory distress (Leong et al. 1971), while exposure of rats to 0.1 ppm for 6 months did not result in non-neoplastic lesions in the respiratory tract (Leong et al. 1981).

## 2.5 CARDIOVASCULAR

Gross necropsy of the heart did not show evidence of lesions in rats exposed to 0.01 ppm BCME for 6 months (Leong et al. 1981).

#### 2.6 GASTROINTESTINAL

No gross lesions were observed in the stomach, small intestine, or large intestine of rats exposed to 0.01 ppm BCME for 6 months (Leong et al. 1981).

# 2.7 HEMATOLOGICAL

No hematological alterations were observed rats exposed to 0.1 ppm BCME for 6 months (Leong et al. 1981).

## 2.8 MUSCULOSKELETAL

No studies examining musculoskeletal effects were identified.

## 2.9 HEPATIC

No gross lesions were observed in the liver of rats exposed to 0.1 ppm BCME for 6 months (Leong et al. 1981).

#### **2.10 RENAL**

No renal lesions were observed in the gross necropsy of rats exposed to 0.1 ppm BCME for 6 months (Leong et al. 1981).

## 2.11 DERMAL

Because BCME is highly reactive, it is directly irritating to skin and other epithelial tissues. Chronic (lifetime) application of BCME (1 mg/dose) to the skin of mice produced a strong corrosive response, including hair loss, hemorrhagic rash, and edema of subcutaneous tissue (Van Duuren et al. 1968). In rabbits, a single application of undiluted BCME led to moderate erythema and marked necrosis, and a primary dermal irritation score of 6 was assigned (Union Carbide 1968). No studies were located regarding dermal effects in humans or animals following inhalation or oral exposure to BCME.

## 2.12 OCULAR

A dose of 5  $\mu$ L (7 mg) applied to the eye of rabbits produced severe cornea1 necrosis (Union Carbide 1968).

#### 2.13 ENDOCRINE

Gross necropsy of the thyroid, parathyroid, and adrenal glands did not show evidence of damage in rats following a 6-month exposure to 0.1 ppm (Leong et al. 1981).

#### 2.14 IMMUNOLOGICAL

No studies were located regarding immunological effects in humans or animals following inhalation, oral or dermal exposure to BCME.

## 2.15 NEUROLOGICAL

Leong et al. (1981) reported that exposure of male rats to 0.1 ppm for 6 months did not result in observable histopathology in the nervous system, but no tests of nervous system function were performed. Drew et al. (1975) noted extreme irritability in rats and hamsters exposed 10–30 times to 1 ppm of BCME, and concluded that this was evidence of central nervous system effects. However, these symptoms were possibly due to treatment-related stress associated with the discomfort of BCME exposure. An apparent dose-dependent increase in the frequency of subarachnoid hemorrhage was noted, but the cause of these lesions and the significance were not discussed.

No studies were located regarding neurological effects in humans or animals following oral or dermal exposure to BCME.

#### 2.16 REPRODUCTIVE

No studies were located regarding effects on reproductive capacity in humans following inhalation, oral, or dermal exposure to BCME.

Leong et al. (1981) found no evidence testicular damage in rats exposed to 0.1 ppm of BCME in air for 6 months. However, no tests of reproductive function were performed, and no tests were performed on females.

## 2.17 DEVELOPMENTAL

No studies were located regarding developmental effects in humans or animals following inhalation, oral, or dermal exposure to BCME.

#### 2.18 OTHER NONCANCER

Other noncancer effects were not examined in inhalation, oral, or dermal exposure studies.

#### 2.19 CANCER

A number of case studies and epidemiological studies of occupationally-exposed workers indicate that inhalation of BCME or CME containing BCME is associated with increased risk of lung cancer (Albert et al. 1975; Collingwood et al. 1987; DeFonso and Kelton 1976; Figueroa et al. 1973; Gowers et al. 1993;

Lemen et al. 1976; Maher and DeFonso 1987; Pasternack et al. 1977; Reznik et al. 1977; Roe 1985; Sakabe 1973; Thiess et al. 1973; Weiss 1976, 1982, 1989; Weiss and Boucot 1975; Weiss and Nash 1997). Table 2-2 summarizes the data from some of these studies. Although the study populations in these reports were often exposed not only to BCME, but also to CME and other chemicals, the consistent findings strongly support the conclusion that BCME is a lung carcinogen in humans. Although quantitative data on exposure levels were not available for most studies, increased risk as a function of exposure duration and/or qualitative estimates of exposure intensity was noted in some cases (DeFonso and Kelton 1976). Weiss and Nash (1997) reported that significant increases in lung cancer deaths were observed in workers with moderate (standardized mortality ratio [SMR] 7.49, 95% confidence interval [CI] 3.23–14.75) or high (SMR 15.21, 95% CI 7.87–26.6) exposure, but not in those with low exposure (SMR 1.38, 95% CI 0.17–4.98). A high proportion of the respiratory tumors were oat cell carcinomas, a particularly rapid-growing and highly lethal tumor (Figueroa et al. 1973; Gowers et al. 1993; Lemen et al. 1976; Weiss et al. 1979). Some tumors appeared after only 5–10 years of exposure (Weiss 1976; Weiss and Boucot 1975) and in young workers (Figueroa et al. 1973; Reznick et al. 1977). Weiss and Nash (1997) showed that the highest risks were found in workers with latencies of 10–19 years.

Table 2-2. Lung Cancer Mortality in Workers Exposed to Bis(Chloromethyl)Ether or Technical-Grade Chloromethyl Methyl Ether

Exposed population	Duration of exposure	Observed lung cancer deaths	Expected lung cancer deaths	Risk <sup>a</sup>	Reference	
669 Chemical	<1 year (n=389)	3	2.1	1.2	DeFonso and Kelton 1976	
plant workers	1-5 years (n=170)	5	1.3	3.8 (p<0.05)		
	≥5 years (n=101)	11	1.1	9.6 (p<0.01)		
	Total	19	5.2	3.8 (p<0.001)		
1,446 chemical plant workers (465 exposed)	≤12 years	39	18.1	2.15 (p<0.001)	Weiss et al. 1979	
721 chemical plant workers	≤19 years	23	4.5	5.1 (p<0.05)	Pasternack et al. 1977	
762 chemical plant workers	≤31 years	32	7.5	4.3 (p<0.01)	Collingwood et al. 1987	
134 anion- exchange plant workers	≥5 years	5	0.54	9,24	Lemen et al. 1976	

Table 2-2. Lung Cancer Mortality in Workers Exposed to Bis(Chloromethyl)Ether or Technical-Grade Chloromethyl Methyl Ether

Exposed population	Duration of exposure	Observed lung cancer deaths	Expected lung cancer deaths	Risk <sup>a</sup>	Reference
1,203 anion- exchange plant workers (258 exposed)	3,785 person- years at risk			5.0 (95% confidence interval 2.0–12.3) <sup>b</sup>	Gowers et al. 1993

<sup>&</sup>lt;sup>a</sup>Observed/expected.

A number of studies in animals confirm that BCME is a potent carcinogen with a short latency period. Some of the key data from these studies are summarized in Table 2-3. As shown in the table, levels as low as 0.1 ppm of BCME produce a high incidence (60–86%) of respiratory tract tumors in exposed rats, and some tumors developed in animals that had been exposed for periods as short as 2 weeks (Kuschner et al. 1975; Laskin et al. 1971; Leong et al. 1981). Most of the tumors were nasal tumors, although some lung tumors also developed. Under similar conditions, mice exposed to 0.1–1.0 ppm did not develop nasal tumors, but they did have a slight increase in the incidence of mice with pulmonary adenomas (Leong et al. 1981) and in the number of tumors per tumor-bearing mouse (Leong et al. 1971). No increased incidence of nasal tumors or lung adenomas was noted in rats or mice exposed to 0.01 or 0.001 ppm (Leong et al. 1981). Hamsters appear to be more resistant to the carcinogenic effects of BCME than mice or rats. However, Drew et al. (1975) observed nasal tumors after 2 years in two hamsters that had been exposed only 1–3 times to 1.0 ppm BCME. Hamsters exposed for ≥10 times to 1.0 ppm had shortened lifespans, so tumors may not have had time to develop.

Table 2-3. Inhalation Carcinogenicity of Bis(Chloromethyl)Ether in Animals **Species** Exposure Exposure Respiratory tumor typeb durationa (strain) level (ppm) Incidence Reference Rat 0.1 1/41 (2%) 10 exposures Nasal Kuschner et (Spragueesthioneuroepithelioma, al. 1975 20 exposures 3/46 (6%) Dawley) lung squamous cell 40 exposures 4/18 (22%) carcinoma, and other 60 exposures 4/18 (22%) respiratory tract tumors 80 exposures 15/34 (44%) 100 exposures 12/20 (60%)

<sup>&</sup>lt;sup>b</sup>Relative risk by internal comparison.

Table 2-3. Inhalation Carcinogenicity of Bis(Chloromethyl)Ether in Animals **Species** Exposure Exposure Respiratory tumor typeb (strain) level (ppm) durationa Incidence Reference 0/112 (0%) Rat 6 months Nasal Leong et al. (Spragueesthioneuroepithelioma 1981 0.001 0/113 (0%) Dawley) 0.01 0/111 (0%) 0.1 96/111 (86%) Mouse (A/H) 0 21 weeks Lung adenoma 20/49 (41%) Leong et al. 1971 1 26/47 (55%) Mouse 0 6 months Pulmonary adenoma 9/86 (10%) Leong et al. (Ha/ICR) 1981 0.001 5/54 (9%) 0.01 3/37 (8%) 0.1 8/27 (30%) Hamster 0.1 67 weeks Lung carcinoma 1/100 (1%) Kushner et al. (Golden 1975 Syrian) Hamster 0.7 6 hours Nasal 1/25 (4%) Drew et al. (Golden esthioneuroepithelioma 1975 6 hours/day for 1/25 (4%) Syrian) 3 days

0/25 (0%)

0/25 (0%)

10 days

30 days

6 hours/day for

6 hours/day for

Following dermal exposure (skin painting), BCME was found to produce skin papillomas and carcinomas in >50% of mice tested after 325 days of treatment (Van Duuren et al. 1968). The carcinomas appeared early, with the first appearing after only 196 days of skin application. Subsequent reports confirmed these findings (Van Duuren et al. 1969, 1972; Zajdela et al. 1980). BCME has also been shown to be a skin tumor initiator. Thus, a single skin application of 1 mg of BCME followed by treatment with a known tumor promoter (phorbol myristate acetate) produced papillomas in a high percentage of treated mice (Van Duuren et al. 1968, 1969; Zajdela et al. 1980). No studies were located regarding carcinogenicity in humans or animals following oral exposure to BCME.

The Department of Health and Human Services has determined that BCME is a known human carcinogen (NTP 2016). EPA has concluded that BCME is a known human carcinogen (EPA Group A) (IRIS 2002) and IARC has concluded that BCME is carcinogenic to humans (Group 1) (IARC 2012, 2017).

<sup>&</sup>lt;sup>a</sup>Unless otherwise noted, exposures were for 6 hours/day, 5 days/week.

<sup>&</sup>lt;sup>b</sup>Observation, after exposure, was for lifetime or until animals were moribund.

## 2.20 GENOTOXICITY

No studies were located regarding genotoxic effects in humans following inhalation, oral, or dermal exposure to BCME. Leong et al. (1981) did not observe any effects on bone marrow chromosomes in rats exposed to 0.1 ppm for 6 months (6 hours/day, 5 days/week). However, the data as reported are not sufficient to conclude definitely that BCME is inactive in this system.

The genotoxicity of BCME has been investigated in several strains of bacteria (see Table 2-4) but such systems may not be optimal for investigating the effects of such a rapidly hydrolyzed material. Specifically, if BCME acts as an alkylating agent to damage DNA, then tests that favor hydrolysis before entry into the cell can occur may yield misleading results.

Table 2-4. Genotoxicity of Bis(Chloromethyl)Ether In Vitro								
			Results					
		Activation						
Species (test system)	Endpoint	With	Without	Reference				
Salmonella typhimurium (strains TA1535, TA1538, TA98)	Gene mutation	+	NA	Anderson and Styles 1978				
S. typhimurium (strain TA100)	Gene mutation	+	NA	Anderson and Styles 1978				

<sup>+ =</sup> positive results; NA = not reported