

US EPA ARCHIVE DOCUMENT

## *AHETF & AEATF II*

# **Exposure Monitoring Programs & Generic Databases**

## Concepts, Objectives, and Sampling Issues

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# Outline

- Important definitions & concepts
- Objectives of the monitoring programs
- Limitations
- Currently proposed designs
- Probability sampling issue

# Handler-Day Exposure

The exposure that a chemical handler would incur during a workday when performing tasks associated with a particular occupational scenario.

$$= \mathcal{E}_x(a, C)$$

Active ingredient  
handled

Set of handling  
conditions (includes the  
particular handler)

### 3 Categories of Handler-Days Relevant to this Program

#### Natural

*A handler-day that actually occurs in practice under conditions not simulated, scripted, or otherwise controlled by the experimenter*

#### Synthetic

*A 'non-natural' handler-day. Some (but not necessarily all) conditions have been simulated, scripted, or controlled by the experimenter*

#### Surrogate

*A handler-day that can be used as a 'substitute for' other handler-days. Surrogate handler-days could be either *natural* or *synthetic*.*

*Definition:*

**Monitoring Event (ME)**

**Monitoring Unit (MU)**


*The specific monitoring activities conducted by researchers to obtain exposure measurements for a single handler-day (natural or synthetic).*

*Includes all conditions (including subject) associated with an experimentally determined handler-day exposure.*

*Synonymous* { *AHETF tends to use MU*  
*AEATF tends to use ME*

# Generic Exposure Principle

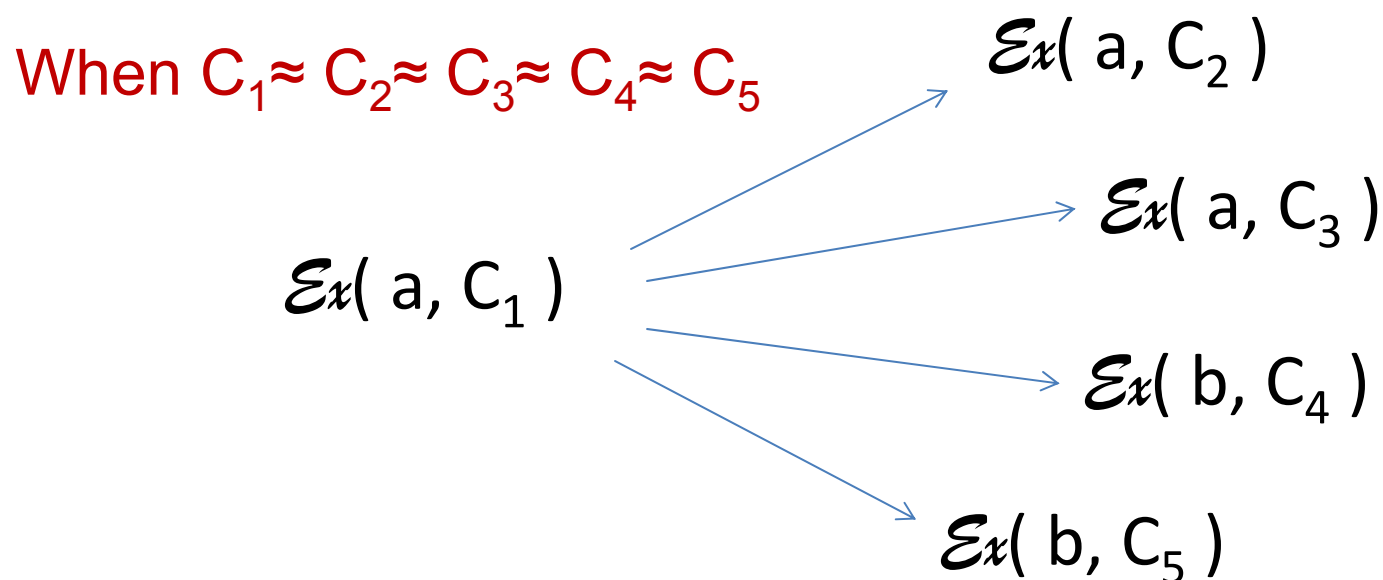
Under the same 'handling' conditions, handler-day exposure does not depend on the particular active ingredient

$$Ex(a, C) = Ex(b, C)$$


Same Conditions

*Thus, exposure data from one chemical can serve as a surrogate for predicting exposure to other chemicals*

# Prediction is also Feasible when Handling Conditions are Sufficiently Similar



*This might be sometimes be a reasonable assumption based on expert opinion*



*An Important Component of 'Handling Conditions':*

## Amount of Active Ingredient Handled (AaiH)

AaiH is any single measure that quantifies the expected degree of worker contact with active ingredient

*The Most Common AaiH Measure:*

*Total amount of a.i. 'used' during a workday  
e.g., (total volume sprayed) x (a.i. concentration)*

*But other Measures of AaiH can sometimes be more Reasonable*

*e.g., Closed System Mixing/Loading:*

*(# times equipment 'touched') x (concentration of a.i.)*

*e.g., Continuous, repetitive tasks such as mopping & wiping:*

*(duration of task) x (concentration of a.i.)*

## A Common and very Useful AaiH Assumption: 'Proportionality'

$$\mathcal{E}_x(a, k \cdot h, C) \approx k \cdot \mathcal{E}_x(a, h, C)$$

Common Handling Conditions

Active ingredient

AaiH

*e.g., Doubling AaiH Implies Doubling Exposure*

*Approximate proportionality is reasonable when an appropriate AaiH measure is used*

# Proportionality Provides a Broader Class of Surrogate Exposures

*The predicted exposure for a different a.i. & AaiH level*

$$\mathcal{E}_x(x, h_x, C)$$

*2 Different  
Surrogate  
Exposures*

$$\left[ \frac{\mathcal{E}_x(a, h_1, C)}{h_1} \right] \cdot h_x$$

*Normalized  
Exposure to a*

$$\left[ \frac{\mathcal{E}_x(b, h_2, C)}{h_2} \right] \cdot h_x$$

*Normalized  
Exposure to b*

*Another Important Component of 'Handling Conditions':*

## Individual Worker

The physical characteristics and work behavior of each unique 'handler' influences exposure, even if the other conditions are the same

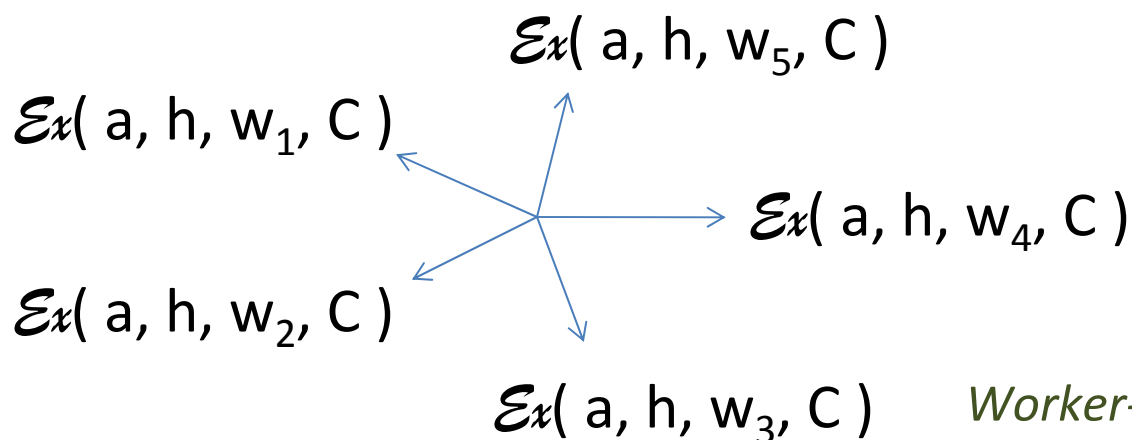
$$\mathcal{E}_x(a, h, w_1, C) \neq \mathcal{E}_x(a, h, w_2, C)$$

↑  
Different Workers  
↑

## Unlike AaiH, the Aggregate Effect of 'Worker' is Considered Non-Predictive

*No simple way to 'transform' one worker's handler-day completely into another's*

*(Although, partial normalization of exposure by easily measured physical characteristics (e.g., body weight) is sometimes considered)*

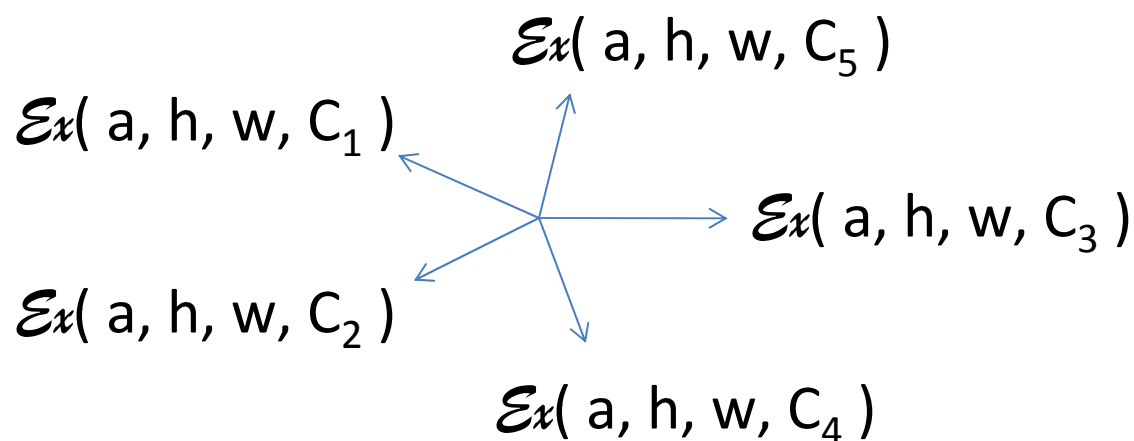


*Worker-worker exposure differences treated as non-predictable 'variation'*

## As are Many Other Handling Conditions

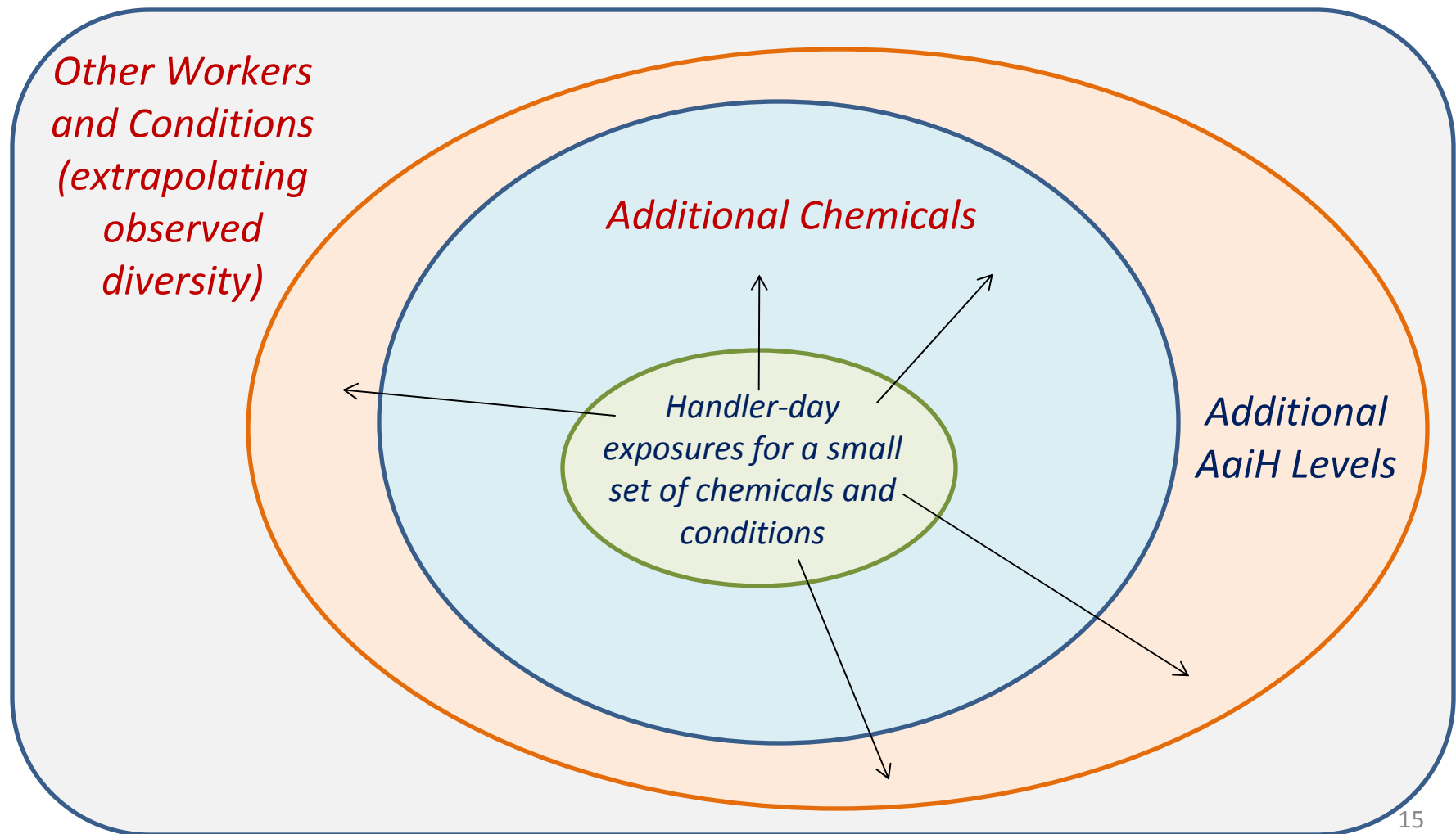
*e.g., Equipment, location, crop, room type,  
cleaning surface, environmental conditions, etc.*

*They obviously impact exposure, but there are no widely accepted relationships that allow them to be used as generic predictors*



*In general,  
different 'conditions' also treated  
as non-predictable 'variation'*

# These Concepts make Creation of a Generic Future Exposure Database Feasible

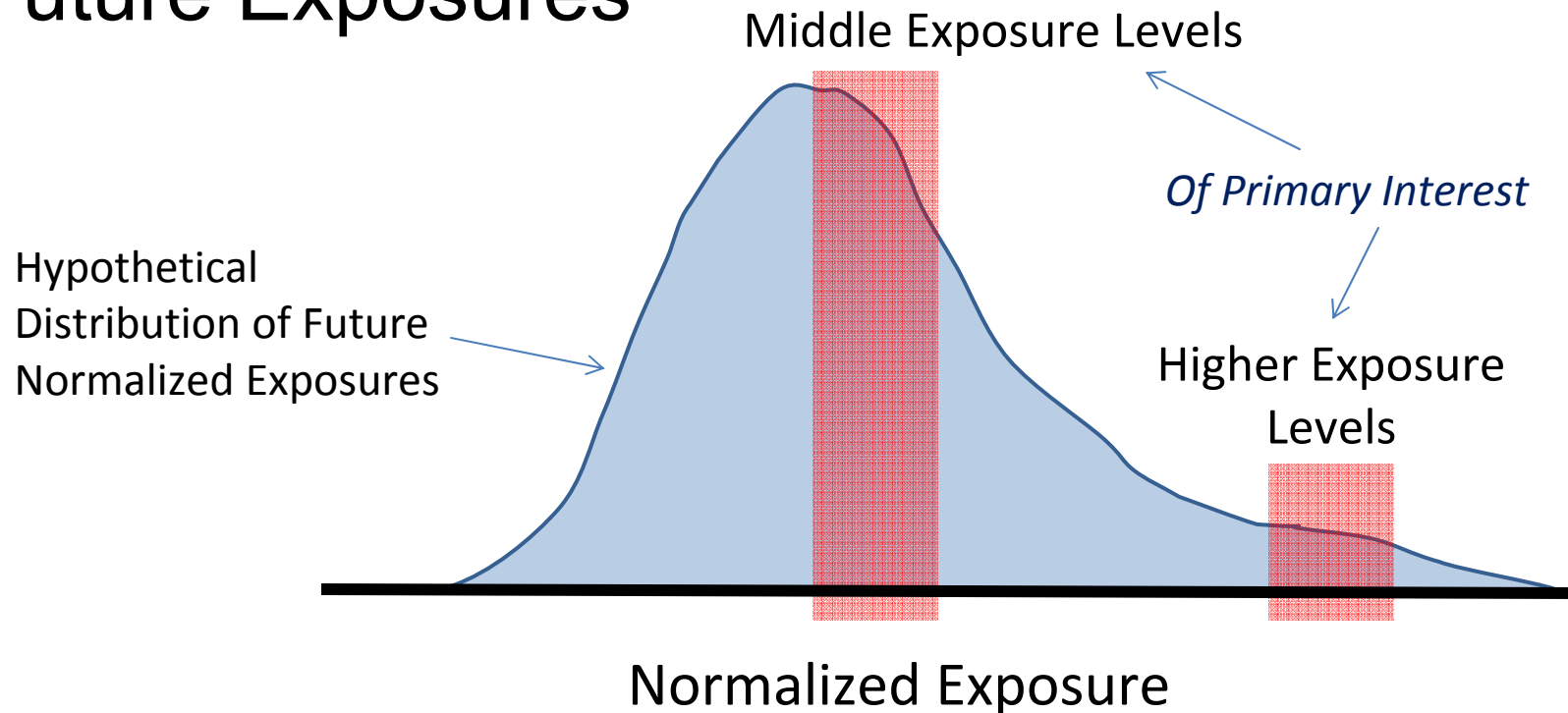




# Goal of Both Programs

- Obtain a database of **natural** and/or **synthetic** handler-day monitoring events (MEs) within each of a number of handling scenarios
- Databases are the Objective, not particular analyses of the data
- These MEs will be used (by regulators and others) as surrogate handler-days to characterize future exposures for regulatory purposes

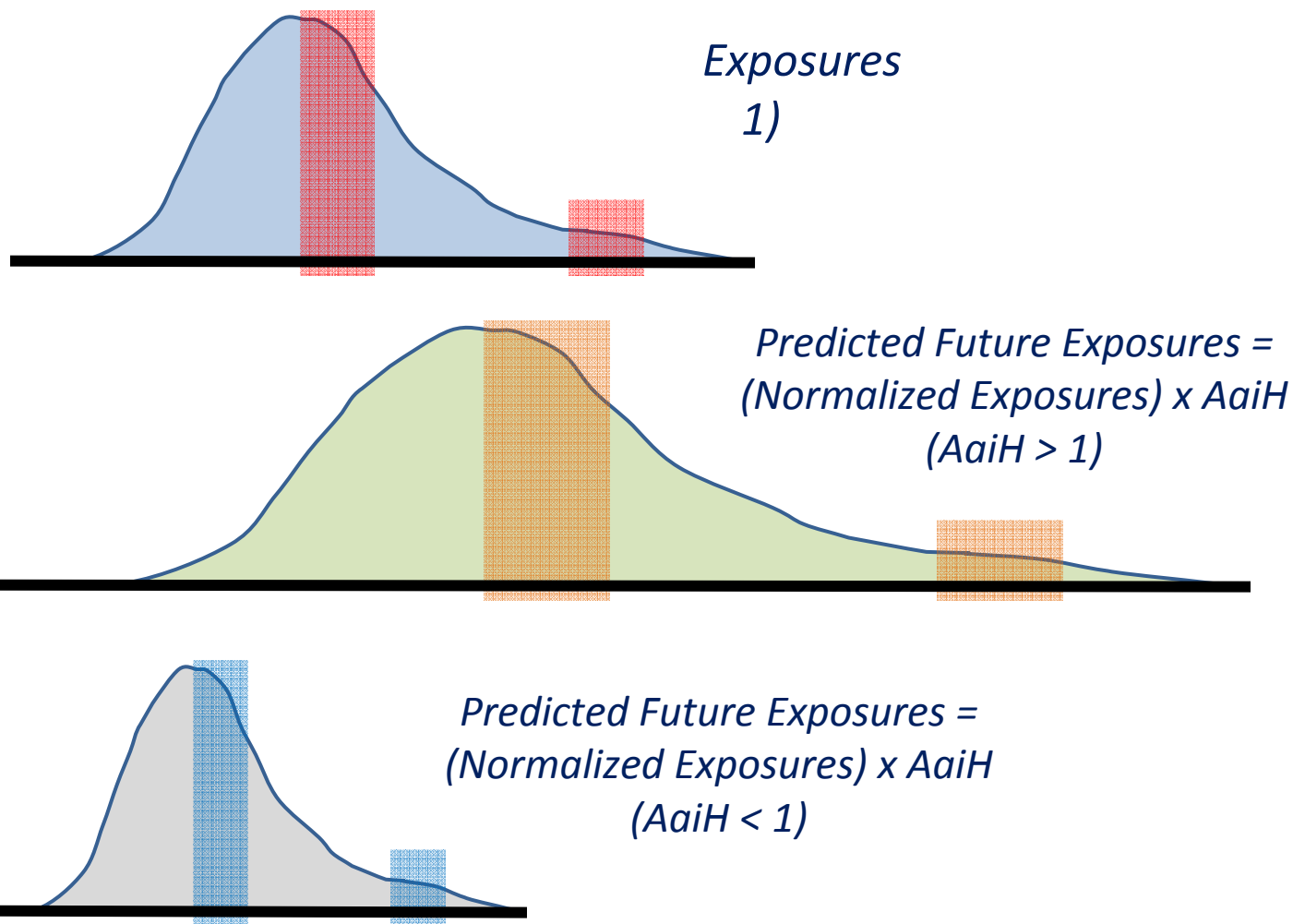
# Future Exposures



*In principle, this represents an array of potential exposures possible for an arbitrary a.i. with  $A_{aiH}=1$  under this scenario*

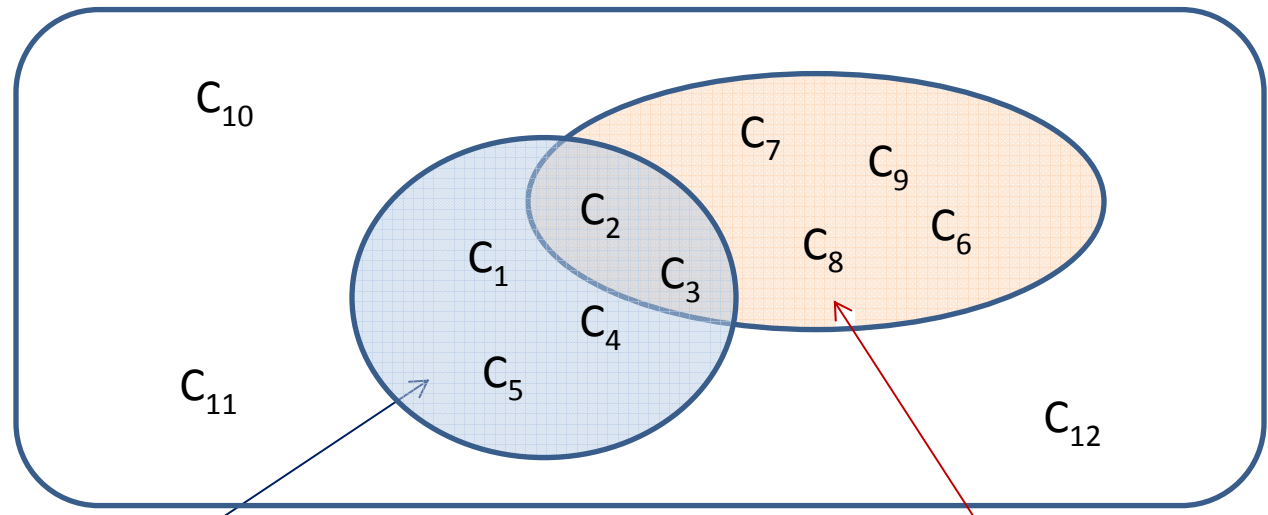
*(If Appropriate  $A_{aiH}$  Measure is Used)*

# Multiplication of Normalized Exposure by an AaiH of Interest Gives Predicted Future Exposures



Note: Handling Conditions can still be Associated with AaiH

All possible handling conditions



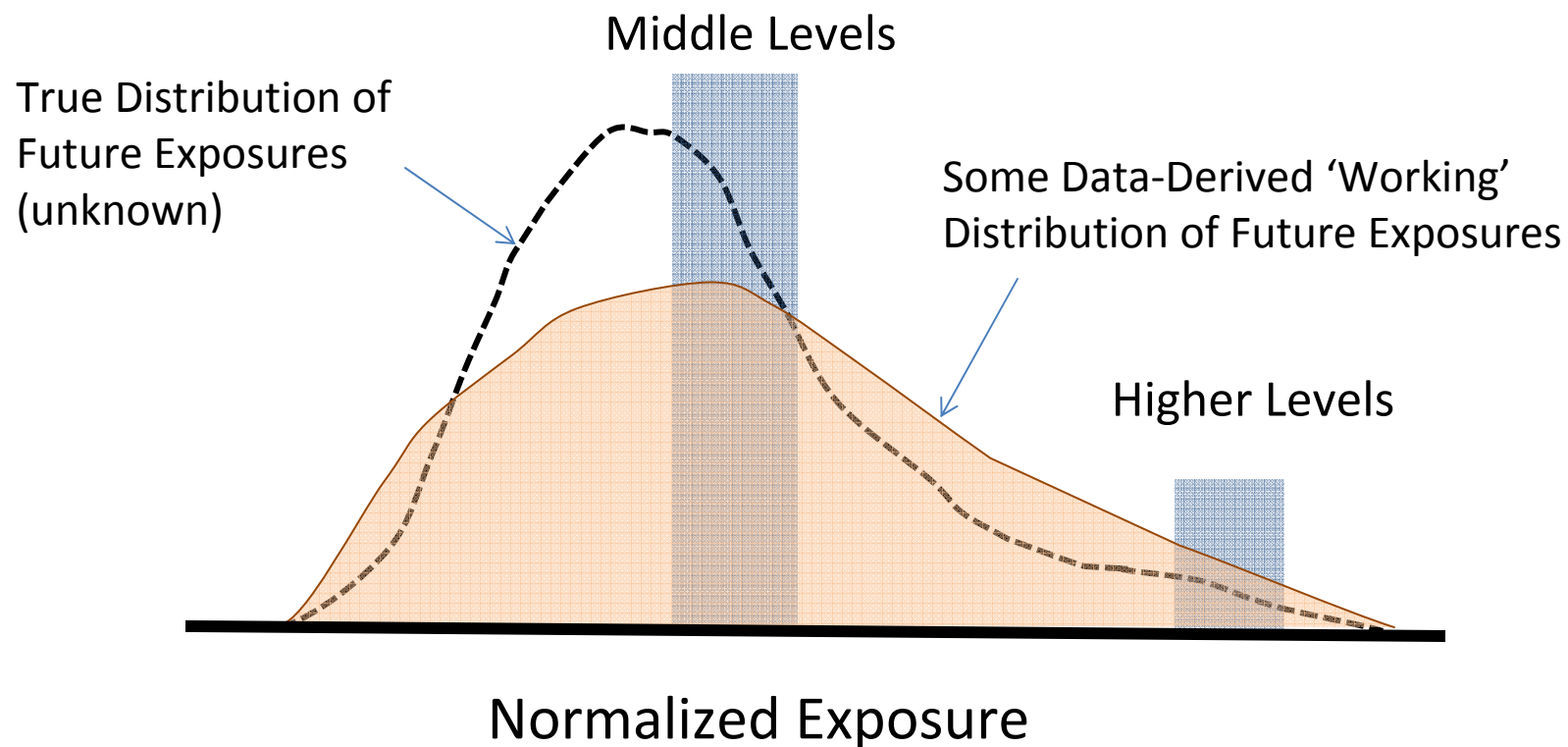
Possible handling conditions when AaiH = 1

Possible handling conditions when AaiH = 10

*Therefore, a set of normalized exposures, derived from different levels of AaiH, is likely to be more diverse than exposures with AaiH = 1*

# The Actual Distribution of Future Exposures would be Nice but is not Absolutely Necessary

A 'broad swath' across possible exposure values is acceptable if it provides a reasonable indication of middle and extreme exposures



Program

Limitations



& Restrictions

# Resources are Limited

- Limited number of chemicals can be monitored  
*AEATF - a single chemical per scenario*
- Limited number handler-days can be monitored per scenario  
*Mean costs/ME are extremely large  
(AHETF: \$35K / ME; AEATF: 30K / ME)*
- Number of scenarios is essentially fixed
- Estimated cost of currently proposed program greatly exceeds original task force budget (some members may withdraw)
- Further increases in program cost will likely doom project

# Synthetic Handler Days are Necessary

- Purely natural handler-days for the small number of chemicals (with their associated AaiH levels & conditions) available are not sufficient to span the scenario
- AEATF: Access to actual work environments is not often practical or permissible
- Synthetic handler-days are created to reproduce and diversify conditions that occur in the scenario, albeit not necessarily with the particular surrogate a.i. used.

*However, apart from the scripted conditions, subjects do perform tasks as they normally would*



# Synthetic Handler Days

## AEATF

Experimental work environments created; actual workers perform semi-scripted tasks to simulate a wide array of handler-day conditions

## AHETF

Agricultural handlers located that are either handling surrogate chemicals under targeted conditions or are willing to do so

Some MEs may represent natural handler-days. Others are synthetic: partially scripted to induce conditions more typical of non-surrogate chemicals.

All targeted conditions are designed to increase diversity of the 'sample'

AHETF

# Data are Obtained in Clusters

- Monitoring activities must occur during a research visit to a particular geographic location during a fixed time period
- Considerable overhead for each visit, therefore cost effective to obtain multiple MEs per 'visit' (i.e., a cluster of handler-days)

In the past, each research visit often corresponded to an independent study. Extent typically < 100 miles, < week duration

- Existing data indicate that mean exposures can differ between 'visits'  
This known 'study effect' is caused by many factors that differ in space/time. Some known, many of them unknown. Collecting all handler-days from a single 'cluster' could under estimate the scenario diversity.

AEATF

## Data also Obtained in Clusters

- Monitoring activities must occur at a particular building used to synthesize work environments and during specific dates (i.e., a site/period)
- It is cost effective to obtain a cluster of multiple MEs at each site/period
- There can be systematic differences in monitored exposure between site/periods, much the same as a 'study effect'
- Collecting all handler-days from a single site/period 'cluster' could under estimate the scenario diversity.
- Multiple site/periods used

AHETF  
Only

## Monitoring Data is Already Available for a Number of Scenarios

*Purchased Studies:* Not designed specifically for this program, but meet established minimum data quality criteria

*Previous Task Force Studies:* Methodology similar to currently proposed approach

**Some Scenarios are Quite Well Populated Already**

*New data must be incorporated with existing data in the generic database*

# Volunteers Only

The use of (fully and partially) synthetic handler-days makes these non-observational 'intentional dosing' studies.

*Requires volunteers only (preferably self-selected)*

*Anything that can be viewed as 'coercion to participate' (e.g., incentives) are prohibited*

With respect to all existing workers, participation/volunteer 'rates' are expected to be extremely small

# Proposed Approach for Obtaining MEs

- Fine tuning of approach used for most studies of this type
  - For AHETF: also analogous to that used for previous task force studies
- Purposive Diversity ‘Sampling’ (PDS) of handler-day conditions (not just workers)

Handling conditions (including AaiH and workers) are purposively selected and/or scripted

Purposive selection goal is to maximize diversity, especially in conditions known to influence exposure

The goal is not to obtain a future exposure handler-day population in miniature

## Purposive Selection of Conditions is Focused on 3 Factors that are Known to Influence Observed Exposures

### 1. 'Clusters'

#### AHETF

Visits to Different Geographic Locations/Dates

Extent usually <100 miles, <1 week

*Provides only opportunity to capture agronomic and other factors that vary over broad geographic extent and dates*

#### AEATF

Use of Multiple Site/Periods

*Provides an opportunity to capture differences in structure and other factors that vary over multiple buildings and dates*

Most important: Clusters capture 'study effects'

## PDS: 3 Factors that are Known to Influence Observed Exposures (continued)

### 2. Levels of AaiH

*AaiH obviously affects exposure, and impacts normalized exposure indirectly through associated handling conditions*

### 3. Workers

*Worker-worker differences can be very large*



## Diversity is Induced for each Scenario

### 1. M Unique Geographic Location/Period Visits

#### AHETF

- N monitored handler-days (monitoring units or MUs) obtained from each visit
- These clusters (i.e. visits) are purposively selected to provide diversity in geography, dates, & agronomic conditions

### 1. M Unique Site/Periods

#### AEATF

- N monitored handler-days (monitoring units or MUs) obtained at each site/period
- These clusters (i.e. sites) are purposively selected to provide diversity in location, dates, & other relevant conditions

## Diversity (continued)

### 2. Levels of AaiH

- AaiH strata are established based on the practical range of AaiH in the scenario
- Within each cluster, MUs are distributed evenly across the different strata

#### AHETF

*5 logarithmically-spaced AaiH strata in most AHETF scenarios,  
1 MU / stratum*

#### AEATF

*3 task-duration strata in the AEATF mop/wipe scenario,  
2 MUs / stratum*

## Diversity (continued)

### 3. Workers

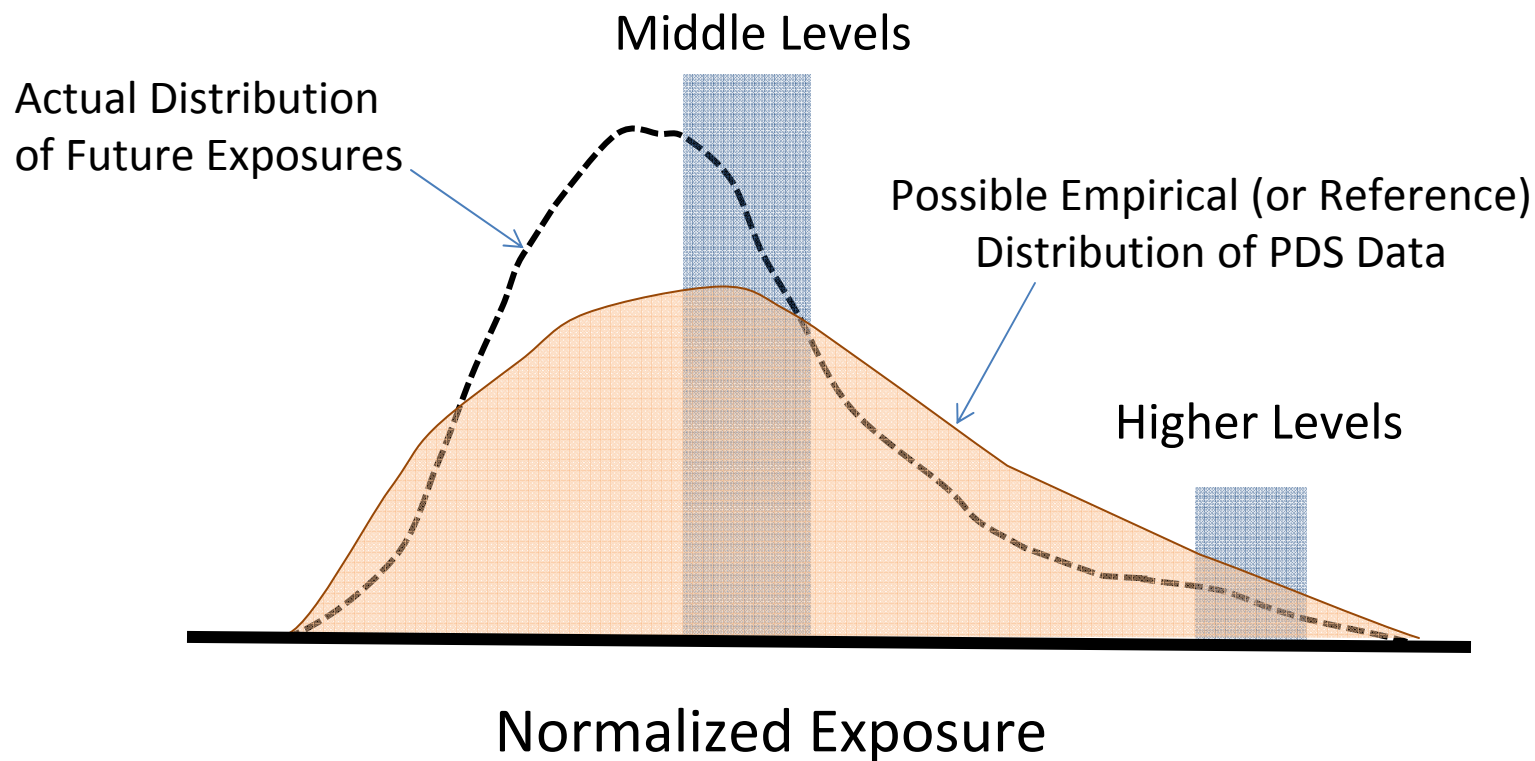
- Every MU/ME is a different worker
- Volunteers are not assigned to scripted conditions for which they have no experience (otherwise a random selection from the volunteer pool is used)

Within each cluster, there is also an informal attempt to reduce homogeneity in other conditions (e.g. equipment used, timing, etc.)

*The purpose of this lower level diversification is merely to reduce any within-cluster correlation and is not viewed as critical to the design*

While not a random sample of future handler-days, such 'diversity oriented' data are expected to span the range of potential exposures

... And capture aspects of the future exposure distribution that are of primary value for regulatory purposes



## Sample Sizes

- Set of MUs are not a random sample from an existing population of handler-days
  - *Synthetic monitoring conditions*
  - *Purposive selection from among (self-selected) volunteers*
- Still need some basis for ‘calibrating’ the effect of a particular sample size
  - *Reference Distribution – a pseudo-random sampling model that is analogous (in some respects) to the purposive sampling process*
  - *A sample size having ‘good properties’ with this reference pseudo-sampling model is desirable. (Results felt to be reasonable for PDS also)*

## Reference Pseudo-Sampling Model for Normalized Exposures

$$\text{Log Normalized Exposure} = \text{Log GM} + A_i + B_{ij}$$

*Normal Between-Cluster Effect*

*Normal Within-Cluster Effect*

*Normalized Exposures are Lognormal:*

*GM = geometric mean*

*GSD = total geometric standard deviation*

*ICC = intra-cluster correlation*

AHETF

## Reference Sampling Model & Sample Sizes

### Benchmark Accuracy Goal:

*Sampling estimates of mean and 95<sup>th</sup> percentile of the reference distribution would be within 3-fold of true values (with 95% probability)*

From existing data:  $GSD \approx 4$      $ICC \approx 0.3$

### Results from Numerous Simulation Studies:

*M=5 clusters, with N=5 MUs per cluster*

*Also OK if  $M \cdot N = 25$  as long as  $N \leq 5$*

*Total N and #/cluster → Budget Exceeded*

## AEATF Reference Sampling Model & Sample Sizes

Same 3-fold Accuracy Benchmark Goal

From limited existing data and other assumptions for the mop/wipe scenario:

$$GSD = 2.86 \quad ICC \leq 0.3$$

Indications from Simulation Studies:

*M=3 clusters, with N=6 MUs per cluster*



AHETF  
Only

## Secondary Benefit of Proposed Design

- With reference sampling model,  $M=5$ ,  $N=5$ , a 10x range in AaiH, and the proposed AaiH stratification:

*A regression analysis would provide at least 80% power for distinguishing AaiH proportionality from independence (i.e., no relationship)*

- This allows some assessment of the (marginal) relationship between exposure and AaiH

*Nice to know, but not viewed as a primary data adequacy objective*

## Why Purposive and Not Probability Sampling?

- In principle, random sampling could yield data-based estimates of error for mean and percentiles

Random sampling  $\neq$  Randomization

- Avoid claims of ‘manipulation’ of results to reduce exposure (Random allocation is used whenever feasible)
- It might be claimed that the data are in some sense ‘more representative’ of some population

Representative in the probability sense

*Not in the commonly-assumed ‘mini-me’ sense*

*Or in the ‘surrogate/generic’ sense*

## Why Not a Probability Sample?

A probability sample from what?

*Target population is not existing handler days, but predicted future handler-days*

Surrogate Chemicals:

*Exposure is only directly measured for surrogate chemicals, and these are only a small portion of all the chemicals used*

Synthetic Conditions:

*Although workers are members of an existing handler population, the handling conditions may be synthetic*

AHETF

*e.g. chemical a applied at lower-than-typical rate to simulate conditions more common for chemical b*

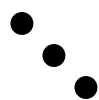
AEATF

*e.g. chemical used at single concentration but task duration varied to simulate conditions existing throughout scenario*

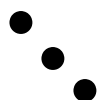
## Probability Sample of Only Handlers?

*It is certainly possible, in principle, to obtain probability sample of workers from an existing population of all handlers*

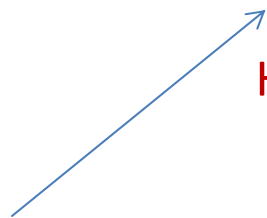
All handlers (in Scenario)



Clusters selected



Handlers selected



Multi-stage Process  
(maybe stratified too)

*Involves listing ALL possible handlers that could perform the scenario tasks (although this listing could be performed in stages)*

## Probability Sample of Handlers?

- The within-cluster listing operations and resulting overhead just to identify a handful of potential subjects would result in unacceptable increases in cost and time

e.g. Qualified agricultural handlers are often extremely rare and quite difficult to locate and recruit

- Selecting a probability sample of subjects and ‘convincing’ them to participate is not the same as ‘volunteering’

Some ethical limitations on usual random sampling methods

Self-selection is incompatible with random selection

## Probability Sample of Handlers?

- A probability sample of just subjects might not be of much value when other handling conditions are not part of the sampling process.
  - Especially when much of the existing AHETF data is PDS*
  - Partially random sampling ≠ random sampling*
- Would likely not be a simple random sample of subjects
  - Unlikely to have a sufficient sample size and structure to estimate standard errors without making simplifying assumptions*
- Given the expected low volunteer rate, synthetic conditions, etc., is there really much practical advantage to 5-6 randomly chosen workers in a cluster compared with 5-6 that are purposively chosen?
  - Small random samples are unlikely to capture diversity*
  - Small participation rates destroy 'representativeness'*
  - Listing overhead → greater costs*

## Summary

- The proposed methodology is expected to adequately cover the range of future exposures under a scenario
- The cost of the currently proposed (PDS) program is at the limits of affordability for both task forces.
- Additional costs can only come at the expense of reducing the number of scenarios monitored. (This would force many members to withdraw from the task forces.)
- There is no obvious advantage to adding a 'partial' probability sampling component to a set of synthetic future handler-days...especially if it increases the cost of the program and/or delays activities