

**Regulations and perspectives on disinfection by-products
- Importance of estimating overall toxicity**

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1 38 **ABSTRACT**

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4 40 Chemical disinfection of drinking-water results in the formation of disinfection
5 40 by-products (DBPs). This paper reviews evidence on the overall toxicity of disinfected water
6 41 instead of focusing on the effects of individual DBPs. The possible health effects of
7 42 ingesting DBPs include development of cancer and adverse reproductive/developmental
8 43 outcomes. Only a few of the 600-700 chlorinated-by-products are regulated, accounting for
9 44 only a small portion of the overall toxicity of DBPs. This review showed that current water
10 45 quality management, based on complying with standard values set for individual DBPs, is
11 46 insufficient in responding to overall toxicity from DBP species. Because water suppliers
12 47 typically focus their water quality management efforts on meeting the defined maximum
13 48 concentration standards for individual regulated parameters, current water management
14 49 practices may not adequately focus on effectively reducing overall DBP toxicity. Therefore,
15 50 we recommend a progressive shift towards preventive and holistic DBP management based
16 51 on a comprehensive health-based risk assessment that takes into account the overall
17 52 toxicity and is supported by a validation of the control processes. We also present a
18 53 prioritized research agenda that will help determine risk assessment and management and
19 54 facilitate the development of regulations. This includes the development of an overall index
20 55 for overall DBP toxicity.
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23 58 **Keywords** carcinogenicity, disinfection by-products, drinking-water quality standards,
24 59 reproductive/developmental toxicity
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1 75 **WEAKNESSES IN THE CURRENT REGULATORY APPROACHES ON**
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3 76 **DBPS**

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6 78 Trihalomethanes (THMs) were originally recognized as a potential health concern in
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8 79 drinking-water in the 1970s. Since then, there has been extensive effort by researchers
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10 80 internationally to detect and identify other disinfection by-products (DBPs) (Krasner *et al.*
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12 81 1989; Stevens *et al.* 1990; Richardson 1998). Although THMs are the most commonly
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14 82 regulated DBP group, they only account for 20-30% of total organic halides (TOX) formed
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16 83 by chlorination. With advances in analytical technologies, 600-700 chlorinated by-products
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18 84 have now been identified. Despite these efforts, it is estimated that detectable by-products
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20 85 account for approximately 50% of TOX. Richardson *et al.* (2007) recently reviewed this
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22 86 issue focusing on carcinogenicity and genotoxicity of DBPs. In addition, the evidence to date
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24 87 has been considered adequate to set health-based values for less than 20 DBPs. As a matter
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26 88 of fact, a total of 18 DBPs currently have health-based values including provisional
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28 89 guideline values that have been derived by World Health Organization (2006), U.S. (U.S.
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30 90 Environmental Protection Agency 2006), European Union (1998), Canada (Health Canada
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32 91 2007), and Japan (Council on Public Welfare Science 2003). No by-product has a
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34 92 health-based value that was determined to account for reproductive and developmental
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36 93 endpoints.

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38 94 Internationally, current DBP-related regulations (World Health Organization 2006;
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40 95 Karanfil *et al.* 2008) address only a relatively small fraction of the overall DBP toxicity. This
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42 96 proportion cannot be easily increased by monitoring increased numbers of DBP species,
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44 97 because regulation and monitoring of more DBPs has both scientific and financial
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46 98 constraints. Therefore, efforts have focused on the overall toxicity of drinking-water.

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48 99 Here we review the results of studies on the overall toxicity of disinfected water instead of
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50 100 focusing on individual DBPs. The toxicity described in this report includes not only
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52 101 carcinogenicity but also reproductive and developmental toxicity. First, this paper presents
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54 102 some evidence that demonstrates toxicity in disinfected water that cannot be attributed to the
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56 103 currently-regulated by-products. This confirms the importance of estimating the overall
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58 104 toxicity of drinking-water. Next, we review attempts to evaluate the overall toxicity of
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60 105 disinfected water using *in vivo* bioassays. We discuss problems with these assays and
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62 106 describe on-going research by the U.S. Environmental Protection Agency (US EPA). Finally,
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64 107 we highlight requirements of future drinking-water quality regulation and make
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66 108 recommendations.

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69 110 **EXAMPLES ILLUSTRATING THE IMPORTANCE OF ESTIMATING**
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71 111 **THE OVERALL TOXICITY OF DISINFECTED WATER**

Contribution of individual by-products to the toxicity of chlorinated water

Some researchers have measured the concentrations of by-products and examined the toxicity of individual by-products by *in vitro* bioassays. **Table 1** shows an example obtained by Itoh & Echigo (2008). The chromosomal aberration test using Chinese hamster lung cells and the transformation test using mouse fibroblast cells were performed as indices to estimate the initiation and promotion, respectively, in the carcinogenesis process. Three by-products: chloroform, dichloroacetic acid (DCA), and trichloroacetic acid (TCA), contributed 2.9% of the chromosomal aberration-inducing activity and 1.4% to the transformation efficiency. The contributions of MX (3-chloro-4-(dichloromethyl)-5-hydroxy-2(5H)-furanone) and bromate ion were almost negligible (less than 0.1%).

Previous research has also reported that individual DBPs make small contributions to overall mutagenicity, as reviewed by Donald *et al.* (1989). Meier *et al.* (1985) estimated that the summed mutagenicity of ten chlorinated by-products was only 7-8% on TA100 and less than 2% on TA98 by the Ames test. Research using the Ames test has shown that MX contributes from 0.2 to 60 percent of the mutagenicity of chlorinated water (Kronberg *et al.* 1988; Kinae *et al.* 2000). On the other hand, the contribution of MX to mutagenicity assessed by the Ames test and by a test using cultured mammalian cells differ. Plewa *et al.* (2002) measured the DNA-damaging activity of several DBPs and MX by alkaline single-cell gel electrophoresis (SCGE, comet assay) using CHO cells. This assay indicated that the genotoxicity of MX was very weak compared to that of bromoacetic acid. This is because MX has high affinity for protein and other nucleophiles to reduce its genotoxicity in mammalian cells. Thus, an estimate of MX based on the result of the Ames test may overestimate its cancer risk (McDonald & Komulainen 2005).

It is widely known that the individual by-products analyzed in these studies account for a small proportion of the overall genotoxicity of chlorinated water and the toxicity of chlorinated water can be attributed predominantly to by-products other than those currently regulated. The overall toxicity measured by *in vitro* and *in vivo* bioassays is discussed in ***in vitro* mutagenicity testing** and ***in vivo* testing**, respectively. There is no guarantee that the concentrations of the regulated DBPs track the concentrations of all DBPs of adverse health consequences. An implication is that current water quality management, based on standard values for individual by-products, is insufficient in responding to overall toxicity arising from all DBP species in drinking-water.

Contributions of organobromine compounds and bromate ion

Table 1

1 149 In general, the concentrations of brominated by-products formed by chlorination are lower
 2 150 than those of chlorinated by-products. However, brominated low molecular weight
 3 151 by-products such as brominated THMs and haloacetic acids (HAAs) are more toxic than
 4 152 chlorinated by-products (Plewa *et al.* 2002; Richardson *et al.* 2007). A complex mixture of
 5 153 by-products from humic acids formed by hypobromous acid has three-fold greater
 6 154 mutagenicity than that formed by hypochlorous acid (Echigo *et al.* 2004).

7 155 A previous study assessed the contribution of organobromine by-products to the induction
 8 156 of chromosomal aberrations in chlorinated water (Echigo *et al.* 2004). Total organic chlorine
 9 157 (TOCl) and total organic bromine (TOBr) in TOX were measured separately. This study
 10 158 found that the contribution of TOBr ranged from 28-52% in the actual tap water conditions
 11 159 of $[Br^-]/TOC = 0.05-0.1$ mg Br/mg C and $[HOCl]/TOC=1.0-1.5$ mg Cl_2 /mg C. In most
 12 160 chlorinated waters, the concentration of TOBr is far lower than that of TOCl; however, TOBr
 13 161 is more toxic. Thus, the contribution of TOBr can be unexpectedly large. In some parts of the
 14 162 world the concentrations of naturally-occurring bromide ions in source waters are often over
 15 163 100 $\mu g/L$. In these cases, the contribution of TOBr to overall toxicity may exceed that of
 16 164 TOCl.

17 165 The contribution of bromate ions to the toxicity of ozonated and chlorinated water is very
 18 166 small or negligible, as shown in **Table 1**.

19 167 **Figure 1** summarizes these findings on ozonated/chlorinated water. The areas of ellipses
 20 168 approximately show the strength of mutagenicity based on the results of chromosomal
 21 169 aberration test (Echigo *et al.* 2004). TOCl and TOBr are formed in chlorinated waters.
 22 170 Although the TOBr concentration is low, the contribution of TOBr to overall toxicity is
 23 171 significant. In waters that are both ozonated and chlorinated, oxidized by-products without
 24 172 halogen are formed, including bromate ions that contribute a very small proportion of the
 25 173 overall toxicity.

26 174 **Figure 2** shows the induction of chromosomal aberrations by humic acid solutions
 27 175 containing bromide ion that had been chlorinated and ozonated/chlorinated (Echigo *et al.*
 28 176 2004). When ozonation was followed by chlorination, the chromosomal aberration-inducing
 29 177 activity was less than that of water treated only with chlorine. Bromate ion up to 1.1 mg/L
 30 178 was formed by ozonation. Water containing bromated ions that has been treated only with
 31 179 ozone has a weak chromosomal aberration-inducing activity. Because ozonation changes the
 32 180 chemical structures of natural organic matter (NOM), different by-products will be formed
 33 181 and induction of chromosomal aberration is less in chlorinated water if it has been ozonated.
 34 182 Thus, ozonation can produce safer (chlorinated) drinking water even with forming bromate
 35 183 ion.

36 184 Some water supply utilities reduce bromide ion in raw water by chlorination to decrease
 37 185 the concentration of bromate ions that is formed by subsequent ozonation (Buffle *et al.*

Figure 1

Figure 2

1 186 2004). Chlorination before ozonation can result in formation of organobromine by-products
2 187 (TOBr). However, the contribution of bromate ion to the toxicity of chlorinated water as a
3 188 final product is negligible, and organobromine by-products have a far greater contribution as
4 189 shown in **Figure 1**. Therefore, this procedure may increase overall toxicity of drinking-water
5 190 and a careful safety evaluation should be performed before this is implemented.

9 191 Meeting water quality standards for individual DBPs (bromate ion in this case) may result
10 192 in other potentially-significant problems being overlooked, leading to potentially
11 193 inappropriate and potentially counter-productive treatment measures. Water quality standards
12 194 for DBPs should be considered as a reference for water quality management. A relative
13 195 evaluation on the toxicity of brominated organic by-products and bromate ion (**Figure 1**) and
14 196 a result indicating the significance of ozonation (**Figure 2**) present examples of the necessity
15 197 of measuring the overall toxicity of drinking-water.

22 199 **Change of the toxicity of chlorinated water and its index**

23 200 Since concentrations of THMs and HAAs in chlorinated drinking-water increase in water
24 201 distribution systems (Tanaka *et al.* 1991; Sasaki & Ueda 1992; Summers *et al.* 1996; Arora
25 202 *et al.* 1997), it is widely believed by water supply utilities that the toxicity of drinking water
26 203 also increases.

30 204 On the other hand, it has been found that mutagenicity of chlorinated water and some
31 205 chlorinated by-products is not stable. Meier *et al.* (1983) have examined the effect of pH on
32 206 the stability of mutagenicity of chlorinated water. Mutagenicity of chlorinated humic acids
33 207 decreases with increasing pH. Nazar & Rapson (1982) have shown that mutagenicity of the
34 208 known organochlorine mutagens decreases by cleavage of organically bound chlorine. As
35 209 cleavage of chlorine proceeds by hydroxide ion, mutagenicity decreases faster at higher pH.
36 210 These findings have shown that the structure of some organochlorine compounds produced
37 211 by chlorination can be changed by hydrolysis.

42 212 Itoh *et al.* (2006) investigated changes in the toxicity in chlorinated water after chlorine
43 213 addition. **Figure 3** illustrates the results. The chromosomal aberration test and transformation
44 214 test were carried out as indices to initiation activity and promotion activity, respectively.
45 215 Firstly, it shows that initiation activity just after chlorination is stronger than promotion
46 216 activity. This was found by a comparison between chlorinated water and various chemicals.
47 217 Secondly, initiation activity is produced by chlorine, however, it is unstable and decreases
48 218 sharply over time after chlorination even in the presence of residual chlorine. In contrast,
49 219 promotion activity produced by chlorine increases slightly over time after chlorination.

55 220 Thus, toxicity that decreases or increases is present in chlorinated water. The increasing
56 221 toxicity (promotion activity) is present in chlorinated water, however, initiation activity
57 222 drastically decreases. Since the toxicity of water is measured by *in vitro* assays in this study,

Figure 3

1 223 it is not possible to get a conclusion on the change of toxicity on the human body. However,
2 224 it should be noted that the overall toxicity associated with carcinogenic activity can be
3 225 mainly attributed to initiation activity and presumably decreases over time after chlorination.
4 226 This was also suggested by the non-two-stage transformation test that is an index of the sum
5 227 of initiation and promotion activity.

9 228 It is well known that concentrations of typical by-products such as THMs and HAAs
10 229 increase after chlorine injection based on studies on characteristics of DBPs formation by
11 230 chlorination and factors affecting the DBPs yield (Rockhow *et al.* 1990; Zhuo *et al.* 2001;
12 231 Liang & Singer 2003). Since many investigations have been carried out on the mutagenicity
13 232 in chlorinated drinking water, some characteristics on the mutagenicity have been clarified.
14 233 One of the representative characteristics is that the mutagenicity easily changes and
15 234 decreases over time after disinfection depending upon pH and temperature of water (Rapson
16 235 *et al.* 1980; Meier *et al.* 1983; Kinae *et al.* 1992; Ueda *et al.* 1996; Itoh *et al.* 2001). These
17 236 findings suggest that the direction of change in the mutagenicity is inconsistent with those of
18 237 THMs and HAAs. In addition to these previous view, **Figure 3** obtained by *in vitro* tests as
19 238 indices of initiation activity and promotion activity shows that the toxicity of chlorinated
20 239 water is not consistent with concentrations of THMs and HAAs. These by-products are
21 240 widely measured, however, they would not be appropriate as indices to compare the toxicity
22 241 of chlorinated drinking-water in distribution systems.

31 242 The stability of some DBPs after the production by chlorine has been examined and
32 243 discussed (Glezer *et al.* 1999; Nikolaou *et al.* 2001; Lekkas & Nikolaou 2004; Xie 2004).
33 244 MX, a strong mutagen and carcinogen (McDonald & Komulainen 2005), is also produced by
34 245 chlorination, however, it has been found that it decreases over time after it is formed by
35 246 chlorine (Meier *et al.* 1987; Kinae *et al.* 1992). This decrease could be attributed to
36 247 hydrolysis and the reaction of MX with residual chlorine. This direction of change is in
37 248 reverse to those of THMs and HAAs. In addition, the change in concentration of MX was
38 249 quantitatively consistent with the change of the toxicity (Itoh *et al.* 2006). Consequently, MX
39 250 is appropriate as an index for comparing the carcinogenicity of tap water near and far from a
40 251 water purification plant.

47 252 This example suggests that we have to focus on the overall toxicity of chlorinated water
48 253 and indicator by-products have to be selected in view of the purpose of water quality
49 254 management.

52 255 **Toxicity and characteristics of chlorine dioxide-treated water**

55 257 The use of so-called 'alternative' (meaning non-chlorine) disinfectants can markedly
56 258 reduce the levels of halogenated organic compounds, including THMs, in drinking-water
57 259 (Fielding & Farrimond 1999; Singer *et al.* 1999; Barrett *et al.* 2000). DBPs formed by
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1 260 chlorine dioxide including inorganic by-products such as chlorite and chlorate ions have also
2 261 been examined (Chang *et al.* 2000a, b; Dabrowska *et al.* 2003; Veschetti *et al.* 2005).
3 262 Chlorine dioxide is generally thought to be suitable for practical disinfection processes with
4 263 reducing the levels of halogenated DBPs (Gates 1998). However, the use of alternative
5 264 disinfectants have had unexpected consequences including the production of a different set
6 265 of toxic DBPs (Sedlak & Von Gunten 2011). For this reason, we have to consider the overall
7 266 level of toxicity of water that is formed by these disinfectants, in addition to typical
8 267 halogenated DBPs.

9 268 From this point of view, *in vitro* short-term genotoxicity tests are useful, because they can
10 269 evaluate the combined action of DBPs present in drinking water as complex mixtures.
11 270 Actually, there have been some studies on the mutagenicity formation by chlorine dioxide
12 271 and the comparison between waters treated with chlorine dioxide and chlorine (Donald *et al.*
13 272 1989; Anderson *et al.* 1990; Itoh *et al.* 2001; Guzzella *et al.* 2004; Onarca *et al.* 2004). As
14 273 described in **Change of the toxicity of chlorinated water and its index**, the mutagenicity in
15 274 chlorinated water changes over time after chlorination. A few studies show the change or
16 275 persistence of DBPs formed by chlorine dioxide in distribution systems (Korn *et al.* 2002;
17 276 Hoehn *et al.* 2003), however, no studies have been conducted on the change in the
18 277 mutagenicity formed by chlorine dioxide over time after the water treatment. We have to
19 278 consider that there are some differences in the mutagenicity level and the change rate of the
20 279 mutagenicity over time after disinfection between chlorination and chlorine dioxidation.

21 280 In one study the toxicity of chlorine dioxide-treated water and associated changes were
22 281 examined and compared with that of chlorinated water (Itoh *et al.* 2007). The chromosomal
23 282 aberration-inducing activity is produced by chlorination and chlorine dioxidation; however,
24 283 this activity is unstable and gradually decreases over time after the treatments. Moreover,
25 284 this activity decreases even under conditions where residual chlorine and chlorine dioxide
26 285 can be detected. Changes in the chromosomal aberration-inducing activity were estimated to
27 286 compare the safety of drinking water treated with chlorine and chlorine dioxide in
28 287 distribution systems. The time to reach the maximum chromosomal aberration-inducing
29 288 activity observed in chlorinated water or chlorine dioxide-treated water was set at 24 hours
30 289 or 10 hours, respectively, based on the data obtained. Decreasing rate constants for the
31 290 chromosomal aberration-inducing activity were calculated as a function of the concentration
32 291 of residual disinfectants. It has been found that the decreasing rate constant is smaller, as the
33 292 residual disinfectant concentration is higher. Residual concentrations in distribution systems
34 293 were set at 0.1 mg/L and 0.4 mg/L. **Figure 4** shows an estimated result based on typical
35 294 drinking-water in Japan. The 1.0 on the vertical axis indicates the maximum chromosomal
36 295 aberration-inducing activity in chlorinated water.

37 296 The levels of chloroform and TOX formed by chlorine dioxidation were approximately

Figure 4

1 297 1% and 5-7%, respectively, of those formed by chlorination (Itoh *et al.* 2007). A major
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3 298 advantage of chlorine dioxide over chlorine is that it produces significantly lower levels of
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5 299 halogenated organic compounds. **Figure 4** shows, however, the chromosomal
6 300 aberration-inducing activity produced by chlorine dioxide is stronger than would be
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8 301 expected based on the quantity of the formed by-products. Therefore, it is important to note
9 302 that the use of chlorine dioxide instead of chlorine as an alternative disinfectant does not
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11 303 dramatically reduce the mutagenicity of the treated water.

12 304 **Figure 4** shows that the activity in chlorine dioxide-treated water that induces
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14 305 chromosomal aberrations decreases more slowly, indicating that the mutagenicity of chlorine
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16 306 dioxide-treated water is more stable. The chromosomal aberration-inducing activity in
17 307 chlorine dioxide-treated water is weaker than that in chlorinated water just after treatments;
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19 308 however, the difference in the two activities decreases over time after treatment. In particular,
20 309 when the residual disinfectants are 0.1 mg/L, the activity in chlorine dioxide-treated water
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22 310 that induces chromosomal aberrations becomes equal to that in chlorinated water at
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24 311 approximately four days. After that, the relationship is reversed. When the residual
25 312 disinfectants are 0.4 mg/L, the difference in the two activities does not rapidly decrease.

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27 313 Assuming that the drinking-water is retained in distribution systems typically for less than
28 314 two days, **Figure 4** also suggests that the mutagenicity of chlorine dioxide-treated water
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30 315 would be 70-80% of that of chlorinated water – a potential advantage of chlorine dioxide
31 316 treatment. In addition, although chlorine dioxide-treated water is less mutagenic than
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33 317 chlorinated water, the difference is small when the drinking-water remains in the distribution
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35 318 system for a long period of time.

36 319 Thus, while at face value chlorine dioxide treatment can ‘solve’ the THMs problem, it
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38 320 should be noted that it is similar to chlorine in terms of the mutagenicity of drinking-water.

39 321 Chlorate ion and chlorite ion are formed as inorganic by-products by chlorine dioxide and
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41 322 standard values have been set for these by-products that prevent its widespread use because
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43 323 they are not easy to achieve. The finding presented here is an additional limitation in using
44 324 chlorine dioxide.

47 326 **Contribution of DBPs to the estrogenic effects of drinking-water**

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49 327 The potential health risks of endocrine disrupting chemicals (EDCs) were of great public
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51 328 interest in the mid to late 1990s. Many epidemiological studies have been conducted to
52 329 examine the relationship between adverse reproductive and developmental outcomes and
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54 330 exposure to chlorinated drinking-water. Some reviews of these studies (Zavaleta *et al.* 1999;
55 331 International Programme on Chemical Safety 2000; Nieuwenhuijsen *et al.* 2000; U.S.
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57 332 Environmental Protection Agency 2006) have suggested that adverse outcomes, such as
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59 333 spontaneous abortion, stillbirth, low birth weight, neurotoxicity, and birth defects, can be

1 334 associated with THMs and chlorinated by-products. These associations were not reported in
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3 335 other studies and further research would be needed to confirm any association.

4 336 Hundreds of compounds have been listed as suspected EDCs (Endocrine Disruptor
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6 337 Screening and Testing Advisory Committee 1998), and most research on EDCs focuses on
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8 338 these individual micropollutants. In contrast, the relationship between the consumption of
9 339 chlorinated water and reproductive and developmental toxicity has been explored in
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11 340 epidemiological studies as mentioned above. Therefore, chlorinated by-products formed
12 341 from NOMs should be an interest in addition to typical EDCs.

14 342 We consider it is important to measure the estrogenic effects of raw water containing both
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16 343 micropollutants and NOMs, and of chlorinated by-products in addition to suspected EDCs.
17 344 The Endocrine Disruptor Screening and Testing Advisory Committee (EDSTAC) (1998)
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19 345 established by the US EPA also recommended that a mixture of DBPs be evaluated for their
20 346 potential to cause endocrine disruption.

22 347 **Figure 5(a)** illustrates the components of water that induce estrogenic effects and how
23 348 they are changed by chlorination (Itoh *et al.* 2009). First, NOMs have a weak estrogenic
24 349 effect that increases after chlorination. Itoh *et al.* (2000a) found that commercial humic acid
25 350 exhibits the estrogenic effect, which increases upon chlorination. In addition, this study
26 351 demonstrated that the estrogenic effect of concentrated Lake Biwa water using the XAD7HP
27 352 resin increases up to 2.3 times upon chlorination. The reasons that chlorination increases the
28 353 estrogenic effect could be 1) chlorine produces by-products such as organochlorine
29 354 substances, which are estrogenic; 2) a low-molecular-weight fraction, which may bind to the
30 355 estrogen receptor in a cell, increases due to the oxidation and hydrolysis caused by
31 356 chlorination; and 3) chlorine releases estrogenic substances, which interact with humic
32 357 substances in the aqueous environment. Itoh *et al.* (2000b) revealed that the main factor
33 358 affecting the increase in the estrogenic effect is the effect of chlorination by-products.
34 359 However, it has not been successful in identifying specific by-products contributing to the
35 360 increase in the estrogenic effect.

44 361 In addition, coagulation and activated carbon treatment decreased the estrogenic effect of
45 362 the source water, but chlorination increased the estrogenic effect of the source water and
46 363 treated waters (Itoh *et al.* 2009). These results suggest that the estrogenic effect is formed
47 364 due to the reaction of chlorine with organic matter that remains after water treatment. It
48 365 should be emphasized that this phenomenon is very similar to the formation of THMs in the
49 366 drinking water treatment process, that is, NOMs are major precursors for both the estrogenic
50 367 effect and THMs.

55 368 On the other hand, the estrogenic effects of most micropollutants decrease after
56 369 chlorination as shown in **Figure 5(a)**. The effects of chlorination of bisphenol A (BPA),
57 370 4-nonylphenol (4-NP), estrone (E₁), 17 β -estradiol (E₂), estriol (E₃), and 17 α -ethynylestradiol

Figure 5

1 371 (EE₂) on the estrogenic effect have been reported (Hu *et al.* 2002; Kuroto-Niwa *et al.* 2002;
2 372 Lenz *et al.* 2003; Tabata *et al.* 2003; Deborde *et al.* 2004; García-Reyero *et al.* 2004; Lee *et*
3 373 *al.* 2004; Nakamura *et al.* 2006; Kuruto-Niwa *et al.* 2007). In fact, some chlorinated
4 374 derivatives or intermediates during chlorination of BPA and 4-NP show stronger estrogenic
5 375 effect than parent compounds, however, the estrogenic effect of these compounds eventually
6 376 decreases after the chlorination with chlorine dosage typically used in practice.

7 377 Different results have been reported about the effect of chlorination on the estrogenic
8 378 effect of river water and treated wastewater. The estrogenic effect decreased by chlorination
9 379 in some studies (Takigami *et al.* 1998; Akatsuka *et al.* 2000), however, it increased in other
10 380 study (Yakou *et al.* 2000). **Figure 5 (a)** indicates that organic matters of which estrogenic
11 381 effect increases or decreases after chlorination are present in raw water. The findings
12 382 demonstrate that the overall estrogenic effects in chlorinated drinking-water are the sum of
13 383 the increased and decreased activities of individual constituents after chlorination. The effect
14 384 of chlorination depends on the quantity of the estrogenic effect that increases and decreases
15 385 by chlorination.

16 386 In addition, the estrogenic effect originated from NOMs shown in **Figure 5(a)**
17 387 following chlorination increased gradually over time, even in the absence of residual
18 388 chlorine (Itoh *et al.* 2009). It is known that the concentration of THMs and HAAs increases
19 389 while in the distribution system. The obtained result suggests that some part of the estrogenic
20 390 effect in drinking water also increases over time after chlorination. The increase in
21 391 estrogenic effect is faster at a higher pH than at a neutral pH, which is reasonable because
22 392 the hydrolysis rate increases as the pH increases. Based on this finding, **Figure 5(b)**
23 393 illustrates the components of the estrogenic effect originated from NOMs. It shows that the
24 394 components, which form the “estrogenic effect formation potential” and “estrogenic effect
25 395 intermediates”, can be defined. The estrogenic substances formed just after chlorination are
26 396 part of the chlorinated by-products. The “estrogenic effect intermediates” change into
27 397 estrogenic substances over time, explaining the increased estrogenic effect shown in **Figure**
28 398 **5(a)** continues to increase over time after chlorination.

29 399 This phenomenon is similar to the formation of THMs because NOMs are major
30 400 precursors of both estrogenic effect and THMs. The “THM formation potential” and the
31 401 “THM intermediates” in the formation process of THMs have definitions that are similar to
32 402 those illustrated in **Figure 5(b)** (Xie 2004). To decrease the estrogenic effects of
33 403 drinking-water, NOMs in addition to suspected EDCs should be removed before chlorination.
34 404 Furthermore, it is important to assess the reproductive and developmental toxicity of
35 405 mixtures of by-products that originated from NOMs.

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59 407 **ATTEMPTS TO ESTIMATE THE OVERALL TOXICITY OF**
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DISINFECTED WATER

In vitro mutagenicity testing

As discussed above, we have to pay much attention to numerous other DBPs in addition to typical ones formed by disinfection. It has been emphasized for many years that it is important to measure and evaluate the toxicity of complex DBP mixtures in chlorinated water. *In vitro* short-term bioassays such as the Ames test can evaluate the combined action of DBPs. Many studies have investigated the mutagenicity of organic extract in disinfected water, including chlorinated water (Loper *et al.* 1978; Donald *et al.* 1989). As mutagenicity tests, the Ames test had been mainly carried out until the 1980s, however, various kinds of *in vitro* bioassays such as assays using cultured mammalian cells have been performed after that.

Our review of studies that compared the mutagenicity of water treated with different disinfectants (Zoeteman *et al.* 1982; Backlund 1985; Meier & Bull 1985; Cognet *et al.* 1986; Kamei *et al.* 1989; Anderson *et al.* 1990; Sayato *et al.* 1991; DeMarini *et al.* 1995; Monarca *et al.* 1998; Guzzella *et al.* 2004; Maffei *et al.* 2005) found that a study by Meier & Bull (1985) yielded typical results. This study showed that the mutagenicity of chlorinated water was the strongest and that chloramine-treated water was also mutagenic. The mutagenicity of chlorine dioxide-treated water was minimal, and ozonated water had no detected mutagenicity. DeMarini *et al.* (1995) showed that different types of disinfected water had mutagenicity in the following order: chlorination > ozonation plus chlorination > chloramination > ozonation plus chloramination > ozonation > raw water. There are additional findings on ozonation such as; ozone has the effect that reduces the mutagenicity of raw water (Zoeteman *et al.* 1982); the mutagenicity of ozonated water is detected in some cases (Cognet *et al.* 1986) and not in others (Meier & Bull 1985; Anderson *et al.* 1990). In addition, these results may vary with raw water quality and a sample preparation procedure etc. For example, Sayato *et al.* (1991) showed that chlorination reduces mutagenicity because the mutagenicity of raw water is strong.

Performing *in vitro* mutagenicity testings is not quantifications of individual chemicals by chemical analysis, and they can provide one of the indicators of the overall toxicity of water. As a matter of fact, epidemiological studies have reported associations between the mutagenicity of chlorinated drinking-water and increased risk of cancers of bladder, rectum, kidney, pancreas, and lymphatic system (Koivusalo *et al.* 1995; Koivusalo *et al.* 1997; Koivusalo *et al.* 1998). The results of *in vitro* mutagenicity testings can be employed for reducing risk of drinking water, and can contribute to develop a better water treatment process. On the other hand, these tests have the limitation that toxicity to the human body cannot be assessed and a health-based value cannot be derived by extrapolating the results

1 445 for humans.

2
3 446

4 447 ***In vivo* testing**

5
6 448 It is essential to estimate the overall toxicity of disinfected water with *in vivo* assays so
7
8 449 that the toxicity of TOX i.e., complex mixtures of chlorinated water, can be estimated.
9 450 However, only a few carcinogenicity studies using experimental animals have been
10
11 451 conducted .

12 452 Bull *et al.* (1982) showed an increased number of tumors when concentrates of US
13
14 453 drinking-water were applied to mouse skin as tumor initiators in initiation/promotion studies.
15 454 The same study also showed that water disinfected by chlorine, ozone, and chloramine
16
17 455 resulted in a greater number of papillomas compared to nondisinfected water. Van Duuren *et al.*
18
19 456 (1986) administered a chlorinated humic acid solution (1 g TOC/L) as drinking-water to
20
21 457 mice for two years. There were no increases in tumors. Similarly no adverse effects relevant
22 458 to carcinogenicity have been detected in other studies (Kool *et al.* 1985; Miller *et al.* 1986;
23
24 459 Condie *et al.* 1994). Condie *et al.* (1985) carried out a sub-chronic toxicity test administering
25 460 chlorinated humic acid solution in drinking water for 90 days. NOAEL (no-observed adverse
26
27 461 effect level) was derived as 0.5 g-TOC/L. Daniel *et al.* (1991) conducted a sub-chronic
28 462 toxicity test in male and female rats. A provisional NOAEL of untreated humic acid solution,
29
30 463 ozonated water and ozonated/chlorinated water was set to be 1.0 g-TOC/L.

31 464 In summary, no studies have shown evidence of the carcinogenic effects of complex DBP
32
33 465 mixtures via drinking-water consumed by rodents. There have been many epidemiological
34
35 466 studies of associations between consumption of chlorinated drinking-water and increased
36 467 risk of various cancers (International Agency for Research on Cancer 2004; U.S.
37
38 468 Environmental Protection Agency 2006). The US EPA has concluded that the available data
39 469 indicates a potential association between consumption of drinking-water and bladder cancer,
40
41 470 and it also suggests a potential association between consumption of drinking-water and
42
43 471 rectal and colon cancers. Although an epidemiological study is useful as a means to observe
44 472 adverse effects on human health, there is no attempt to date to derive health-based values of
45
46 473 DBPs based on epidemiological evidence. *In vivo* assays using experimental animals should
47 474 be given a higher priority to derive a health-based value of a DBP mixture.

49 475 50 51 476 **Toxicity estimation project initiated by the US EPA**

52 477 Available evidence suggests that it will be essential to perform *in vivo* toxicity tests on
53
54 478 disinfected water to obtain results that can be used to derive water quality standards for TOX
55 479 ($\mu\text{g Cl/L}$). The US EPA has initiated the Integrated Disinfection Byproducts Mixture
56
57 480 Research Project for this purpose (Simmons *et al.* 2002; 2004).

58 481 In this project, the following *in vivo* toxicology tests will be performed: reproductive and

1 482 developmental toxicity, mutagenicity, carcinogenicity, immunogenicity, hepatic/renal
2 483 toxicity, neurotoxicity, developmental neurotoxicity, and kinetics/metabolism. *In vitro*
3 484 bioassays on similar types of toxicity have also been designed to be performed. It is very
4 485 valuable that, in addition to *in vitro* bioassays, *in vivo* toxicity studies that are associated not
5 486 only with carcinogenicity but also with other several types of toxicity have been planned.

9 487 This project confronts challenging technical issues such as the development of a
10 488 concentration procedure using a reverse osmosis membrane (Speth *et al.* 2008), preparation
11 489 of water concentrates that are drinkable by laboratory animals (Narotsky *et al.* 2008), and
12 490 ensuring the chemical stability of water concentrates (McDonald *et al.* 2010). Since
13 491 multi-disciplinarity is needed to tackle these technical issues, specialists from different fields
14 492 have designed and initiated this huge project.

18 493 The reproductive and developmental endpoints are being given first priority in this project.
19 494 The results obtained to date showed that 130-fold concentrates of both chlorinated and
20 495 ozonated/postchlorinated water appeared to exert no adverse developmental effects
21 496 (Narotsky *et al.* 2008). Cancer endpoints, however, were assigned a lower priority because of
22 497 the difficulty in obtaining enough water concentrate for a two-year cancer bioassay. In
23 498 addition, water is disinfected either by chlorination or by ozonation/postchlorination, and
24 499 there is no plan to research adverse effects of water that has been treated with chlorine
25 500 dioxide or chloramines (Simmons *et al.* 2008). Future research progress is highly
26 501 encouraged.

33 502 Since obtaining useful information for actual regulation depends on the progress and
34 503 success of *in vivo* bioassays, they should be given a higher international priority.

38 505 CONCLUSIONS AND RECOMMENDATIONS

41 507 The regulation of DBPs has played a great role in producing safe drinking-water; however,
42 508 there are numerous limitations with the current system. Only a few of the 600-700
43 509 chlorinated by-products are regulated, accounting for only a small portion of the overall
44 510 toxicity represented by DBPs.

47 511 Water suppliers typically focus their water quality management efforts to comply with
48 512 defined maximum concentration standards for individual regulated parameters. As a result,
49 513 toxicity from causes other than regulated by-products is overlooked, leading to potentially
50 514 inappropriate and potentially counter-productive treatment measures. The contribution of
51 515 bromate ion to overall water toxicity (**Figure 1**) and the toxicity and changes in chlorine
52 516 dioxide-treated water (**Figure 4**) are good examples. Standard values are never sufficient as
53 517 golden rules as far as DBPs are concerned. Instead, they should serve as important points of
54 518 reference for water quality management.

1 519 We recommend a paradigm shift towards preventive and holistic DBP management based
 2 520 on a comprehensive health-based risk assessment that takes into account the overall toxicity.
 3 521 This approach is recommended in the WHO Guidelines for Drinking-water Quality as
 4 522 "Water Safety Plans" (WSPs). WSPs require assessment of risks from catchment to
 5 523 consumer, and implementation of control measures that are validated to effectively mitigate
 6 524 risks. Moreover, the WSP approach puts more emphasis on monitoring of control measures
 7 525 rather than on monitoring at end-of-pipe against an ever-growing list standards. The
 8 526 implication for DBP management is to focus efforts on the implementation and monitoring
 9 527 of preventive control measures such as removal of DBP precursor compounds, the
 10 528 consideration of the costs and benefits of using alternative or non-chemical disinfection
 11 529 processes, and if appropriate, to establish and validate removal of DBPs prior to distribution.
 12 530 Care must be taken to not compromise disinfection efficacy in efforts to reduce DBP toxicity,
 13 531 and this should also be demonstrated in the WSP risk management plan.

14 532 Other than a progressive shift to promotion of WSPs, there may be a limited number of
 15 533 immediately implementable policy or regulatory actions. One step would be to keep standard
 16 534 values that have been derived with sufficiently large safety (uncertainty) factors. For
 17 535 example, first, an alternative approach such as the benchmark dose method has been
 18 536 introduced to derive tolerable daily intakes (TDIs). This method may give a new
 19 537 health-based value that differs from a previous value, even when the same toxicity data are
 20 538 analyzed. Second, it has been emphasized that a standard value should be set using an
 21 539 appropriate allocation of the TDI to drinking-water. An actual measurement of the proportion
 22 540 of intake from drinking-water may give a new allocation of intake instead of the default
 23 541 value, ultimately resulting in a new health-based value. Even in these cases, however, any
 24 542 changes in the present standard values should be considered carefully and the overall toxicity
 25 543 of water should be considered.

26 544 International organizations and national standard value setting committees should collect
 27 545 information on the overall toxicity of disinfected water. Obtaining useful information for
 28 546 actual regulation depends on the progress and success of *in vivo* bioassays that can be used
 29 547 to derive health-based values. Therefore, *in vivo* assays with experimental animals should be
 30 548 given a higher international priority.

31 549
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36 554
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Table 1 Contribution of individual DBPs to the chromosomal aberration-inducing activity and the transformation-inducing activity in chlorinated water (Itoh & Echigo, 2008).

DBPs	Chromosomal aberration-inducing activity	Transformation-inducing activity (by the two-stage assay)	Experimental conditions
Chloroform	0.5%	0.9%	Humic acid solution chlorinated with Cl ₂ /TOC = 1.0.
DCA	0.8%	0.25%	
TCA	1.6%	0.25%	
MX	<0.1%	<0.1%	Chlorinated Lake Biwa water.
Bromate	<0.1%	—	Humic acid solution treated with ozone/chlorine sequential treatment. Br ⁻ in the humic acid solution; 37.5 mg/L.

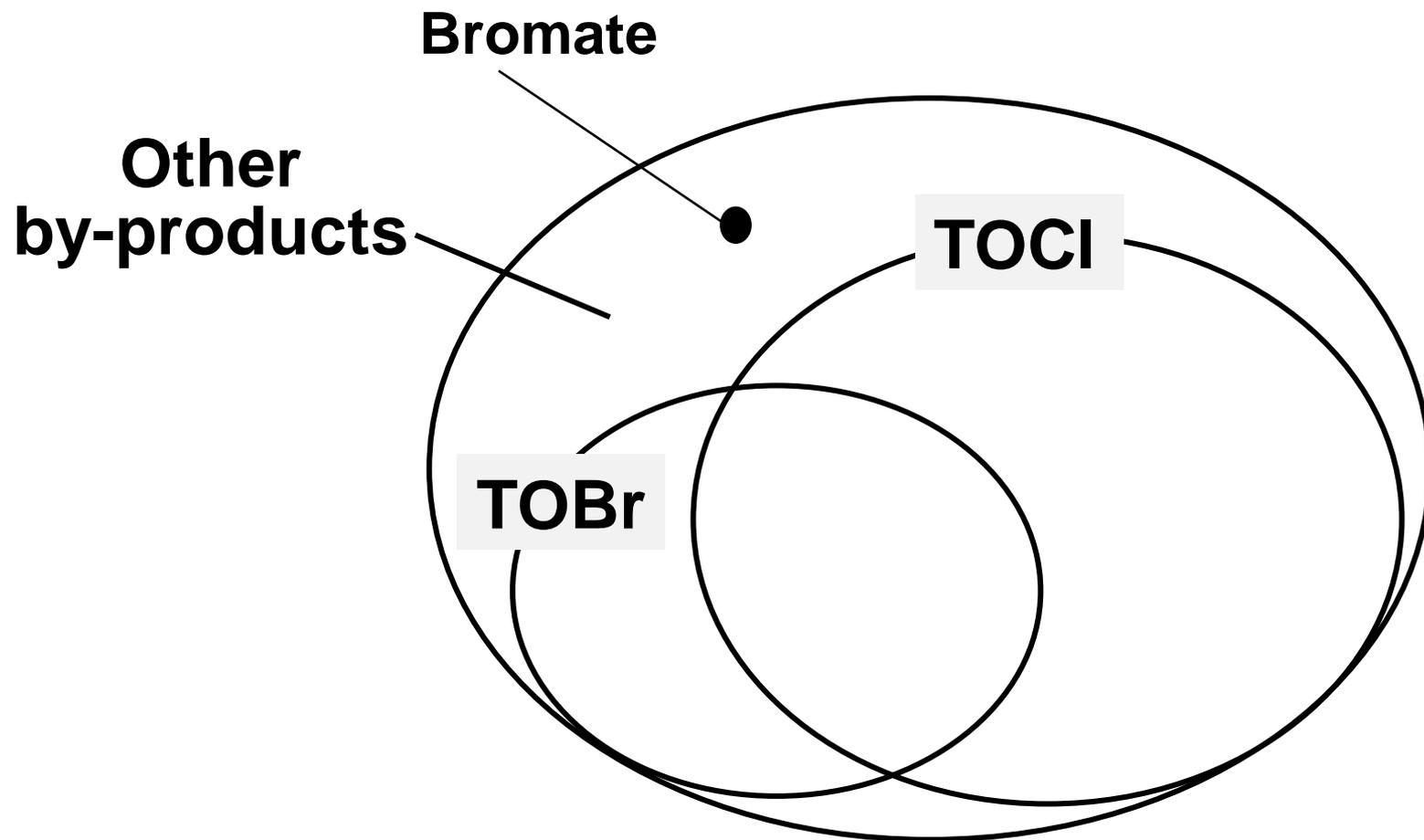


Fig. 1. Contributions of DBPs to the mutagenicity of ozonated/chlorinated water.

The areas of ellipses suggest the strength of mutagenicity based on the results of chromosomal aberration test.

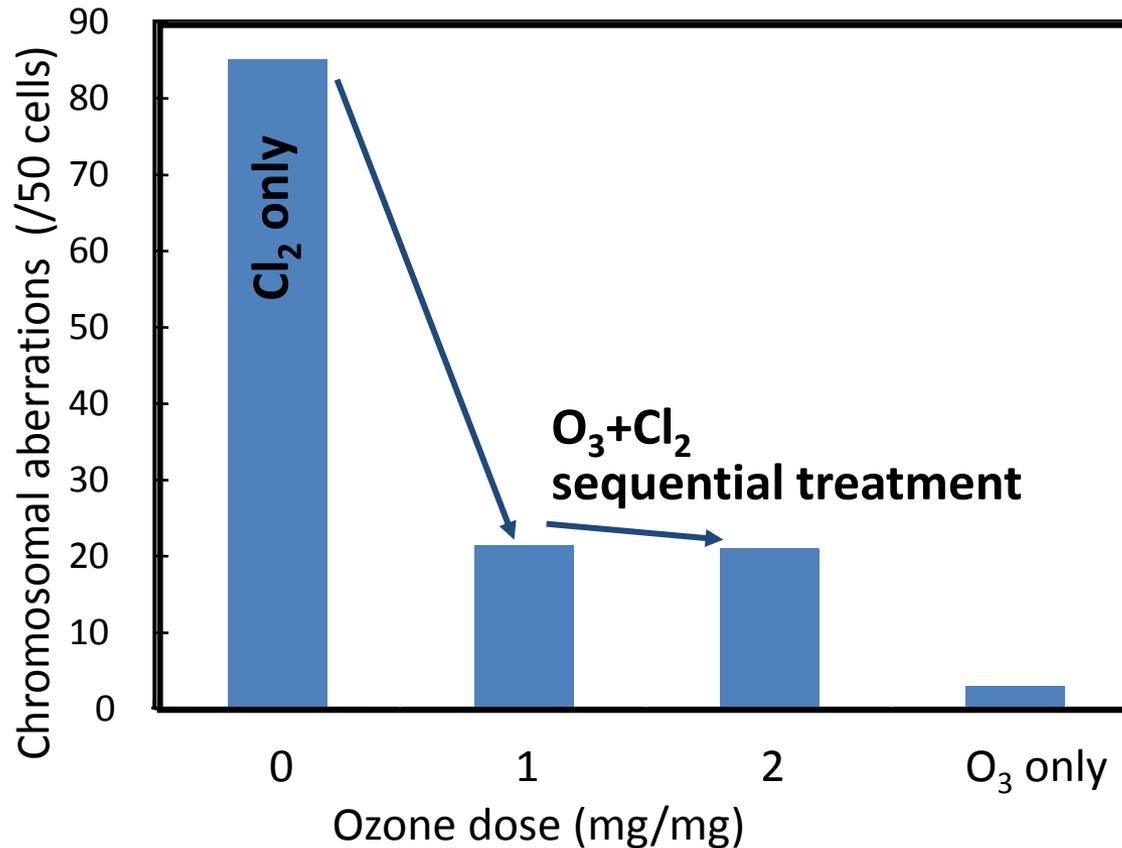


Fig. 2. Effect of ozonation on the chromosomal aberration-inducing activity in chlorinated water with Br^- (Echigo *et al.*, 2004).

Conditions: humic acid concentration, 750 mg C/L; Br^- , 37.5 mg/L; reaction time, 1 day; temperature, 20°C; chlorine dose, 1500 mg Cl_2 /L; pH, 7.0.

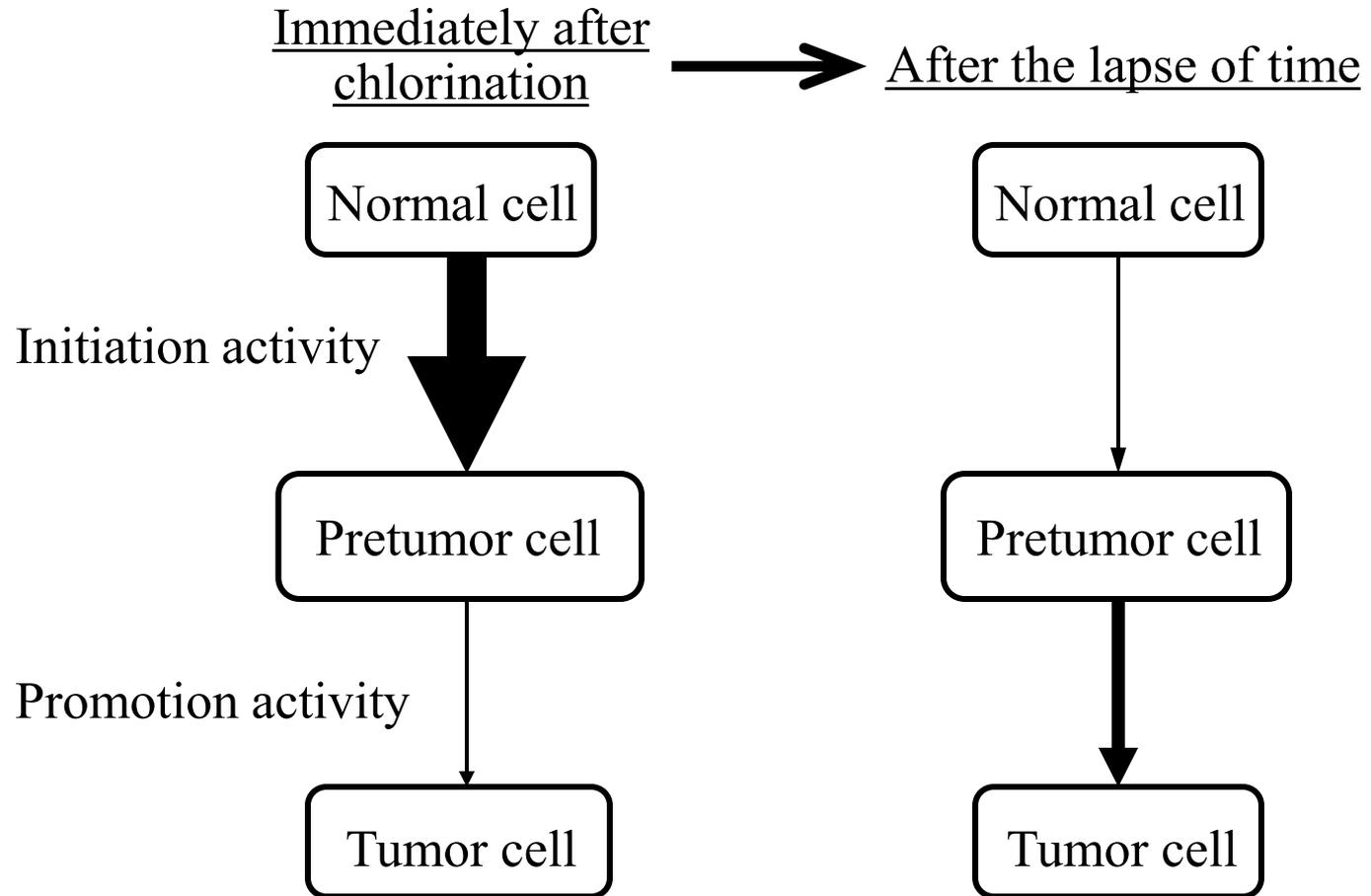


Fig. 3. Proposed change of the toxicity of chlorinated water (Itoh *et al.*, 2006).

The thickness of arrows show the strength of initiation activity and promotion activity. Changes of the thickness of arrows after the lapse of time indicate changes of initiation activity and promotion activity in the presence of residual chlorine.

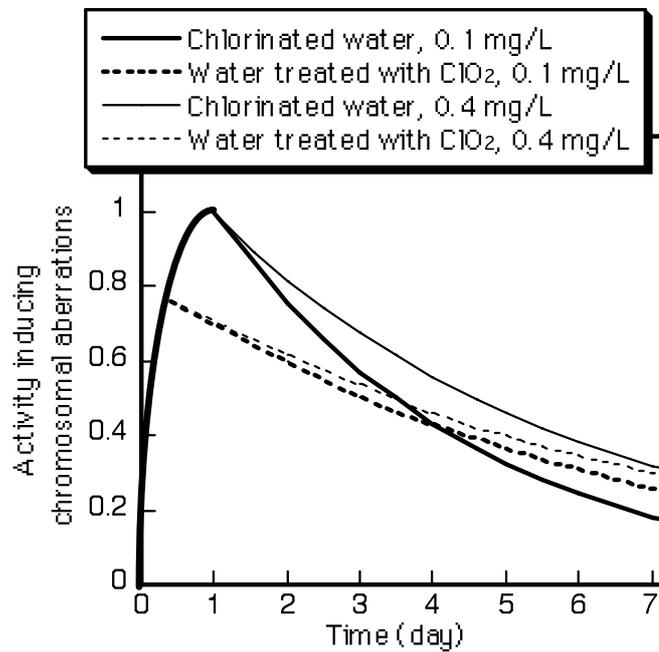


Fig. 4. Estimated changes in the chromosomal aberration-inducing activity in drinking-water (Itoh *et al.*, 2007). DOC of raw water, 2.0 mg/L; DOC after rapid sand filtration, 1.1 mg/L; added disinfectant, 1.1 mg/L (disinfectant/DOC=1); assumed residual disinfectant concentrations, 0.1 and 0.4 mg/L.

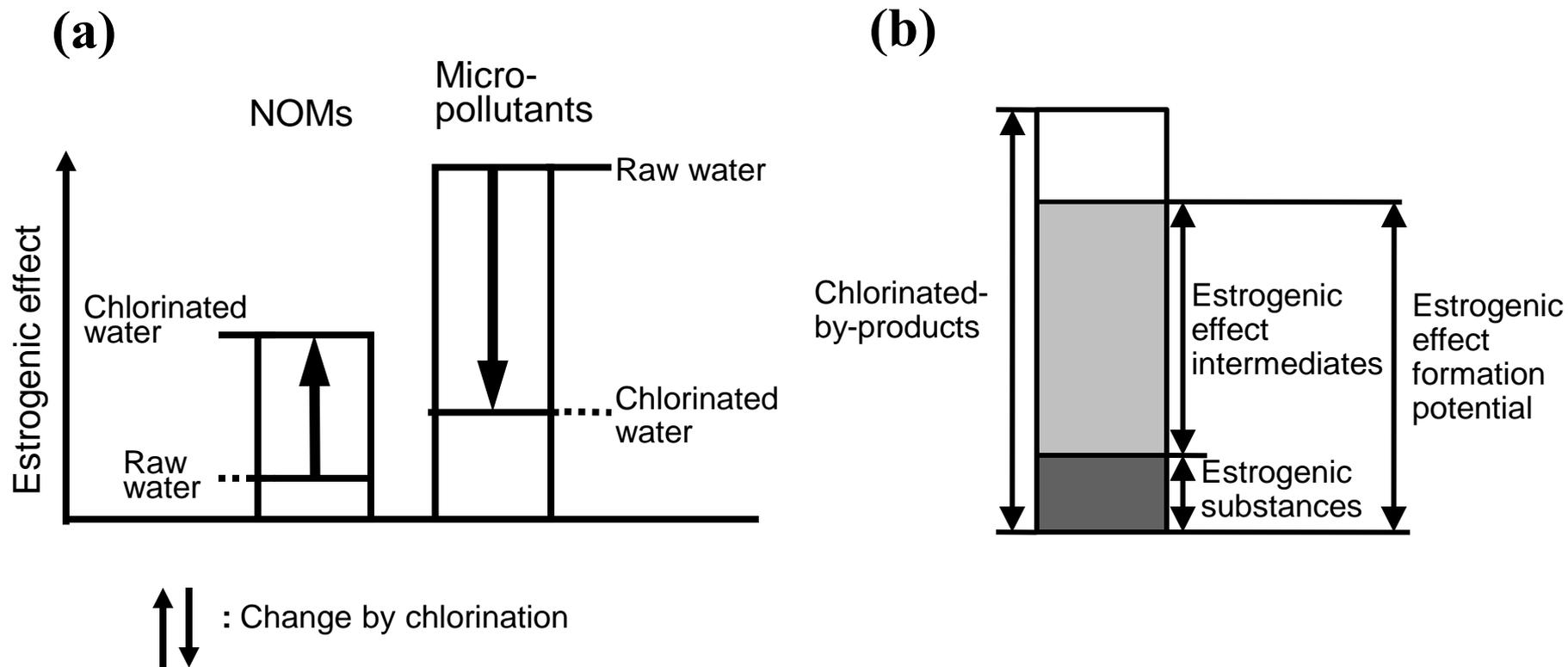


Fig. 5. Components of the estrogenic effects in chlorinated drinking-water (Itoh *et al.*, 2009).