

4. TERRESTRIAL ENDPOINTS

The quotient method, as discussed in Sect. 3.1, consists of dividing the ambient concentrations of toxicants by the concentration at which some toxic effect is induced. It is used in this section to provide an indication of the likelihood of effects due to emissions of the individual RACs. The other risk analysis methods are not readily applicable to terrestrial organisms because of the small toxicological data base for most terrestrial taxa, the lack of standard tests and toxicological benchmarks in the data base, and the lack of agreed-upon standard responses for terrestrial biota.

4.1 VEGETATION

The phototoxicity data for the gaseous and volatile RACs are presented in Table B-1, the concentrations in ambient ground-level air are in Tables 2.3-1 and 2.3-2, and the quotients of the ratios of these values are in Tables 4.1-1 and 4.1-2. The ambient concentrations are the increment of the entire RAC to the background concentration at the point of maximum ground-level concentration (Sect. 2.3). It is assumed that the RAC is composed entirely of the representative chemical and that the background concentration is zero. Quotients were calculated from two classes of data: (1) the lowest toxic concentration found in the literature for any flowering plant species, as an indication of maximum toxic potential of the RAC, and (2) the range across studies of the lowest concentrations causing effects on growth or yield of the whole plant or some plant part. The latter set of responses is relatively consistent and closely related to crop and forest yield.

The worst atmospheric toxicants in the emissions of both technologies are hydrocarbon gases (RAC 6). This rank is biased, since the worst-case representative chemical (ethylene) is a plant hormone, whereas most members of this RAC are essentially inert (National Research Council 1976). However, since atmospheric ethylene has caused significant damage to crops near urban areas and near petrochemical plants (National Research Council 1976), the emission rate of this gas

Table 4.1-1. Toxicity quotients for terrestrial plants for the Lurgi/Fischer Tropsch process. Ambient concentrations in air (annual, median, ground-level) and soil (soil solution or whole dry soil basis) are divided by concentrations causing reductions in growth, yield, or other toxic responses.^a

RAC	RAC name	Air concentration/ lowest toxic concentration	Range of air concentration/ growth-effects concentration	Soil concentration/ lowest toxic concentration	Range of soil concentration/ growth-effects concentration
1	Carbon monoxide	2.57 E-04	4.21 E-08	b	b
2	Sulfur oxides	1.31 E-01	2.18 E-02 - 6.54 E-02	b	b
3	Nitrogen oxides	1.76 E-02	9.23 E-04 - 1.76 E-02	b	b
4	Acid gases	3.00 E-05	3.00 E-05	b	b
5	Alkaline gases	1.74 E-06	1.64 E-02 - 5.71 E-02	b	b
6	Hydrocarbon gases	34	c	c	c
7	Formaldehyde	c	c	c	c
8	Volatile organochlorines	c	c	c	c
9	Volatile carboxylic acids	c	c	c	c
10	Volatile O & S heterocyclics	d	d	d	d
11	Volatile heterocyclics	c	c	c	c
12	Benzene	3.93 E-07	3.91 E-04	3.91 E-04	6.14 E-06
13	Aliphatic/alicyclic hydrocarbons	4.77 E-12	6.14 E-06	6.14 E-06	3.16 E-02 - 1.02 E-01 ^e
14	Mono- or diaromatic hydrocarbons	2.81 E-05	1.02 E-01 ^e	1.02 E-01 ^e	c
15	Polycyclic aromatic hydrocarbons	c	c	c	c
16	Aliphatic amines	c	c	c	c
17	Aromatic amines	c	c	c	c
18	Alkaline nitrogen heterocyclics	c	c	c	c
19	Neutral N, O, S heterocyclics	c	c	c	c
20	Carboxylic acids	c	c	c	4.72 E-11 - 4.72 E-10
21	Phenols	c	c	c	c
22	Aldehydes and ketones	3.64 E-03	8.95 E-07	8.95 E-07	3.11 E-05
23	Nonheterocyclic organosulfur	3.03 E-07	3.11 E-05	3.11 E-05	c
24	Alcohols	c	2.33 E-09 ^e	2.33 E-09 ^e	c
25	Nitroaromatics	c	9.01 E-08	9.01 E-08	c
26	Esters	c	c	c	c
27	Amides	c	c	c	c
28	Nitriles	c	c	c	c
29	Tars	c	c	c	c
30	Respirable particles	c	c	c	c
31	Arsenic	1.91 E-06	1.23 ^e	1.23 ^e	5.78 E-02 ^e - 1.23 ^e
32	Mercury	c	3.04 E-07	3.04 E-07	2.79 E-09 - 3.04 E-07
33	Nickel	c	9.84 E-02 ^e	9.84 E-02 ^e	1.17 E-04 - 9.84 E-02 ^e
34	Cadmium	c	7.6 E-03	7.6 E-03	1.69 E-04 - 7.6 E-03
35	Lead	c	2.58 E-02 ^e	2.58 E-02 ^e	2.31 E-04 - 2.58 E-02 ^e
36	Other trace elements	c	b	b	b
37	Radioactive materials	c	b	b	b

^aAir, soil, and soil solution concentrations are presented in Table 2.3-1. Toxic concentrations are presented in Appendix 8.

^bNo accumulation in soil.

^cNo emissions.

^dNo phytotoxicity data.

^eQuotients calculated from concentrations in soil and results of tests performed in soil. Quotients without superscript e were calculated from concentrations in soil solution and results of tests performed in nutrient solution.

Table 4.1-2. Toxicity quotients for terrestrial plants for the Koppers-Totzek/Fischer-Tropsch process. Ambient concentrations in air (annual, median, ground-level) and soil (soil solution or whole dry soil basis) are divided by concentrations causing reductions in growth, yield, or other toxic responses.^a

RAC	MAC name	Air concentration/ lowest toxic concentration	Range of air concentration/ growth-effects concentration	Soil concentration/ lowest toxic concentration	Range of soil concentration/ growth-effects concentration
1	Carbon monoxide	1.24 E-02	2.04 E-06	b	b
2	Sulfur oxides	1.05 E-01	1.76 E-02 - 5.28 E-02	b	b
3	Nitrogen oxides	2.82 E-02	1.48 E-03 - 2.82 E-02	b	b
4	Acid gases	4.82 E-04	4.82 E-04	b	b
5	Alkaline gases	1.76 E-08		b	b
6	Hydrocarbon gases	43.5	2.09 E-02 - 7.30 E-02		
7	Formaldehyde	c	c	c	c
8	Volatile organochlorines	c	c	c	c
9	Volatile carboxylic acids	c	c	c	c
10	Volatile O & S heterocyclics	c	c	c	c
11	Volatile N heterocyclics	c	c	c	c
12	Benzene	1.90 E-09		c	c
13	Aliphatic/alicyclic hydrocarbons	5.85 E-12		4.80 E-04	7.57 E-06
14	Mono- or diaromatic hydrocarbons	3.47 E-05		4.78 E-02	4.78 E-02 - 7.75 E-02 ^b
15	Polycyclic aromatic hydrocarbons	c	c	c	c
16	Aliphatic amines	c	c	c	c
17	Aromatic amines	c	c	c	c
18	Alkaline N heterocyclics	c	c	c	c
19	Neutral N, O, S heterocyclics	c	c	c	c
20	Carboxylic acids	c	c	c	c
21	Phenols	c	c	c	c
22	Aldehydes and ketones	3.94 E-03		4.39 E-05	4.39 E-05
23	Nonheterocyclic organosulfur	2.47 E-04	8.10 E-04	1.13 E-06 ^d	
24	Alcohols	c		3.45 E-06	
25	Nitroaromatics	c	c	c	c
26	Esters	c	c	c	c
27	Amides	c	c	c	c
28	Nitriles	c	c	c	c
29	Tars	c	c	c	c
30	Respirable particles			b	b
31	Arsenic			0.12 ^d	5.63 E-03 ^d - 0.12 ^d
32	Mercury	4.28 E-04		6.83 E-05	6.27 E-07 - 6.83 E-05
33	Nickel			6.0 E-02 ^d	7.12 E-05 - 6.0 E-02 ^d
34	Cadmium			1.36 E-02	3.01 E-04 - 1.36 E-02
35	Lead			1.95 E-03 ^d	1.74 E-05 - 1.95 E-03 ^d
36	Other trace elements			b	b
37	Radioactive materials			b	b

^aAir, soil, solution concentrations are presented in Table 2.3-2. Toxic concentrations are presented in Appendix B.

^bNo accumulation in soil.

^cNo emissions.

^dQuotients calculated from concentrations in soil and results of tests performed in soil. Quotients without superscript d were calculated from concentrations in soil solution and results of tests performed in nutrient solution.

should be specifically considered in the future. The most serious phytotoxicants in air (ignoring ethylene) are SO_x and NO_x . The maximum annual average concentrations predicted for SO_2 (RAC 2) from Lurgi and Koppers-Totzek are within a tenth of those that cause visible injury to needles of sensitive white pines, and both SO_2 and NO_x (RAC 3) concentrations are greater than a hundredth of those that reduce growth or yield of several plant species.

Because of its ubiquity and importance as a phytotoxicant, SO_2 (RAC 2) has been well studied for its effects on crop yield. McLaughlin and Taylor (in press) proposed the following dose-response relationship for yield reduction in beans as a function of SO_2 exposure:

$$\% \text{ yield reduction} = -17.4 + 29.2 (\log \text{ dose in ppmh}).$$

This empirical relationship is based on a regression of 20 points from five field experiments on soybeans and snap beans. Eighty percent of the variation in yield reduction was associated with variation in dosage, and the equation was significant at $\alpha = 0.0001$.

Because SO_2 appears to be the most serious phytotoxic air pollutant, we use this relationship to examine the potential effects of full-growing-season exposure to SO_2 from Koppers-Totzek on crop yield. If we assume a 200-d growing season for soybeans on the eastern site and a 12-h exposure day, the SO_2 dose at $6.87 \mu\text{g}/\text{m}^3$ SO_2 is 6.25 ppmh. That dose results in a 5.8% reduction in yield by McLaughlin and Taylor's formula.

This predicted effect is remarkable in that it results from an SO_2 concentration that is more than 10 times lower than the lowest concentration reported to affect yield. This anomaly is due to the great length of a growing season relative to the length of experiments. The longest fumigation available to McLaughlin and Taylor was 337 h. Thus, use of their formula for a full growing season requires an extrapolation of almost a factor of 10 in the duration component of the dose. Because the experimental field fumigations are typically carried out in the most sensitive stage (assumed to be the pod-fill in the case of beans), use of the formula for the full growing season probably overestimates effects.

We might place a lower bound on the level of effect by assuming that effects occur only during pod-fill. If that stage is assumed to last 30 d, the dose is 0.99 ppmh. This is less than a quarter of the threshold dose for effects on yield (3.92 ppmh).

For an actual synfuels plant, this SO_2 emission would be added to a background SO_2 concentration that may reach $80 \mu\text{g}/\text{m}^3$ under the current annual average ambient air quality standard and would interact with ozone, which reaches phytotoxic levels in many areas of the United States. This analytical exercise demonstrates the need for the full-season field experiments on effects of SO_2 and $\text{SO}_2 + \text{O}_3$ originally planned for the USEPA's National Crop Loss Assessment Network.

The phytotoxicity of materials deposited on the landscape is a more complex phenomenon than that of gases and vapors. Because the atmospheric transport model AIRDOS-EPA has a deposition velocity of zero for inorganic gases and does not model the formation of aerosols, it is assumed that RACs 1 through 5 do not accumulate in the soil. This assumption is likely to be acceptable except in the case of SO_4 deposition in forests with acid soils. The effects of SO_4 deposition in forests result from regional-scale emissions and atmospheric processes and are therefore beyond the scope of this report. Deposited nongaseous RACs were assumed to accumulate in the soil over the 35-year life of the liquefaction plant. Losses due to decomposition and leaching from the root zone were calculated by the terrestrial food chain model (Sect. 2.3). The toxicity data (Table B-3) were primarily derived from exposure of plants or plant parts to solutions of the chemicals rather than to contaminated soil because few data are available on toxicity in soil. Whereas the results of tests done in soil can be directly compared with concentrations in whole soil, results of tests done in solution must be compared with a calculated concentration in soil solution. Because the concentration in soil solution is more difficult to model than concentration in whole soil and requires more simplifying assumptions, solution concentrations are less reliable. In addition, as with the gases and vapors, the toxicity

data are from a wide variety of tests and measured responses that are not equivalent. Finally, for most of the RACs, only one or two chemicals have been tested. We cannot determine if the chemicals used are representative of the entire RAC.

The most phytotoxic RACs deposited in soil are polycyclic aromatic hydrocarbons (PAHs) (15), arsenic (31), cadmium (34), nickel (33), and lead (35). The high rank of RAC 15 is suspect because benzo(a)pyrene and some other PAHs appear to act as plant hormones and can stimulate growth at very low concentrations. Thus, while PAHs can modify plant growth at concentrations as low as 0.5 ng/g soil, there is no evidence that they reduce plant growth, even at relatively high experimental concentrations (Edwards, 1983). Therefore, heavy metals appear to be the most serious soil pollutants, and methods for predicting their effects require attention.

4.2 WILDLIFE

Tables 4.2-1 and 4.2-2 present the lowest toxicity quotients for terrestrial animals for the two technologies. The quotients are calculated from the lowest lethal concentration for any species and from the lowest concentration producing any toxic effect (Table B-3) divided by the highest annual average ground-level concentration in air. Data from all species were pooled because there were not enough data on the nonmammalian taxa for separate treatment. Carcinogenesis and other genotoxic effects were not included.

Lethality is considered because it is a consistent and frequently determined response that has clear population implications, but all predicted concentrations are well below lethal levels. The lowest toxic concentrations include a diversity of endpoints, most of which cannot be readily related to effects on wildlife populations but which occur at concentrations that are as low as a ten-thousandth of lethal concentrations. These responses range from increased airway resistance in 1-h exposures of guinea pigs to impaired lung and liver function in human occupational exposures. The most toxic RACs by this sublethal criterion are the conventional combustion products sulfur oxides

Table 4.2-1. Toxicity quotients for terrestrial animals for the Lurgi/Fischer-Tropsch process. Concentrations in air (annual, median, ground-level) are divided by lethal concentrations and the lowest toxic concentrations.^a

RAC	Name	Lowest lethal concentration	Lowest toxic concentration
1	Carbon monoxide	5.03 E-10	1.08 E-05
2	Sulfur oxides	4.72 E-04	8.5 E-02
3	Nitrogen oxides	1.60 E-04	3.93 E-03
4	Acid gases	4.00 E-08	1.20 E-07
5	Alkaline gases	5.21 E-06	2.81 E-07
6	Hydrocarbon gases		1.06 E-07
7	Formaldehyde	b	b
8	Volatile organochlorines	b	b
9	Volatile carboxylic acids	b	b
10	Volatile O & S heterocyclics	2.62 E-11	2.62 E-11
11	Volatile Nheterocyclics	b	b
12	Benzene	6.21 E-08	6.21 E-08
13	Aliphatic/alicyclic hydrocarbons	5.80 E-08	3.81 E-06
14	Mono- or diaromatic hydrocarbons	3.53 E-06	6.70 E-05
15	Polycyclic aromatic hydrocarbons		
16	Aliphatic amines	b	b
17	Aromatic amines	b	b
18	Alkaline N heterocyclics	b	b
19	Neutral N, O, S heterocyclics		
20	Carboxylic acids	b	b
21	Phenols		
22	Aldehydes and ketones	5.06 E-05	1.78 E-03
23	Nonheterocyclic organosulfur	5.45 E-09	8.18 E-08
24	Alcohols	3.04 E-06	5.27 E-05
25	Nitroaromatics	b	b
26	Esters	b	b
27	Amides	b	b
28	Nitriles	b	b
29	Tars	b	b
30	Respirable particles		6.28 E-02
31	Arsenic		3.06 E-05
32	Mercury		1.12 E-07
33	Nickel	4.42 E-09	4.42 E-09
34	Cadmium	2.78 E-09	1.39 E-06
35	Lead		2.56 E-05

^aAmbient air concentrations are presented in Table 2.3-1. Toxic concentrations are presented in Appendix B.

^bNo emissions.

Table 4.2-2. Toxicity quotients for terrestrial animals for the Koppers-Totzek/Fischer-Tropsch process. Concentrations in air (annual, median, ground-level) are divided by lethal concentrations and the lowest toxic concentrations.^a

RAC	Name	Lowest lethal concentration	Lowest toxic concentration
1	Carbon monoxide	2.43 E-08	5.21 E-04
2	Sulfur oxides	3.82 E-04	6.87 E-02
3	Nitrogen oxides	2.57 E-04	6.30 E-03
4	Acid gases	6.43 E-07	2.93 E-06
5	Alkaline gases	5.29 E-11	2.85 E-09
6	Hydrocarbon gases		1.35 E-07
7	Formaldehyde	b	b
8	Volatile organochlorines	b	b
9	Volatile carboxylic acids	b	b
10	Volatile O & S heterocyclics	b	b
11	Volatile N heterocyclics	b	b
12	Benzene	3.01 E-10	3.01 E-10
13	Aliphatic/alicyclic hydrocarbons	7.12 E-08	4.68 E-06
14	Mono- or diaromatic hydrocarbons	4.35 E-06	8.25 E-05
15	Polycyclic aromatic hydrocarbons		
16	Aliphatic amines	b	b
17	Aromatic amines	b	b
18	Alkaline N heterocyclics	b	b
19	Neutral N, O, S heterocyclics	b	b
20	Carboxylic acids	b	b
21	Phenols	b	b
22	Aldehydes and ketones	5.48 E-05	1.93 E-03
23	Nonheterocyclic organosulfur	2.65 E-06	3.97 E-05
24	Alcohols	7.92 E-06	1.37 E-04
25	Nitroaromatics	b	b
26	Esters	b	b
27	Amides	b	b
28	Nitriles	b	b
29	Tars	b	b
30	Respirable particles		2.76 E-01
31	Arsenic		6.08 E-06
32	Mercury		2.52 E-05
33	Nickel	7.92 E-09	7.92 E-05
34	Cadmium	1.14 E-08	5.68 E-06
35	Lead		3.66 E-06

^aAmbient air concentrations are presented in Table 2.3-2. Toxic concentrations are presented in Appendix B.

^bNo emissions.

(2) and respirable particulates (30). Although these concentrations may constitute a locally significant increment to the background concentration of these major pollutants, the significance of ambient air pollution to wildlife is largely unknown. The assumption that protection of human health will automatically protect wildlife is not scientifically defensible.

5. EVALUATION OF RISKS

5.1 EVALUATION OF RISKS TO FISH

Table 5.1-1 lists, for each technology, the RACs determined to be potentially ecologically significant by one or more of the three methods employed in this report. The significance criterion for the quotient method is an acute-effects quotient greater than 0.01, i.e., the lowest observed LC_{50} or TL_{M96} less than a hundred times the estimated environmental concentration. For analysis of extrapolation error, RACs are considered to be significant if the risk that the environmental concentration may exceed the PGMATC of one or more of the reference fish species is greater than 0.1. For ecosystem uncertainty analysis, RACs are considered to be significant if the risk of a 25% reduction in game fish biomass is greater than 0.1.

A total of nine RACs were determined to be significant for one or more technologies. RAC 5 (ammonia) and RAC 34 (cadmium) were the only RACs found to be significant for both technologies and all risk analysis methods. RAC 4 (acid gases) was significant for both technologies according to the quotient method and analysis of extrapolation error; however, this RAC could not be addressed using ecosystem uncertainty analysis. In general, analysis of extrapolation error rated the organic RACs substantially more hazardous, relative to the inorganic RACs, than did the other two methods. The reasons for these differences in sensitivity among methods are not clear at this time.

The exposure analyses, the significance criteria, and the methods themselves are conservative; therefore, it would be premature to conclude that adverse consequences would result from the contaminant releases assessed in this report. These nine RACs should, however, be used in future refinements of the risk analyses and in future toxicological and ecological research. In addition to the RACs listed in Table 5.1-1, there are three RACs for which nonzero exposures were estimated but no applicable toxicity data were available: RACs 10 (volatile O & S heterocyclics), 19 (neutral N, O, and S heterocyclics, and 24 (alcohols).

Table 5.1-1. RACs determined to pose potentially significant risks to fish populations by one or more of three risk analysis methods: quotient method (QM), analysis of extrapolation error (AEE), and ecosystem uncertainty analysis (EUA)

Lurgi/Fischer-Tropsch process	Koppers-Totzek/Fischer-Tropsch process
4 (acid gases) - QM, AEE	4 (acid gases) - QM, AEE
5 (alkaline gases) - QM, AEE, EUA	5 (alkaline gases) - QM, AEE, EUA
9 (volatile carboxylic acids) - AEE	9 (volatile carboxylic acids) - QM, AEE
20 (carboxylic acids, excluding volatiles) - AEE	34 (cadmium) - QM, AEE, EUA
31 (arsenic) - AEE	
32 (mercury) - AEE, EUA	
33 (nickel) - EUA	
34 (cadmium) - QM, AEE, EUA	

There are two ways to compare the two technologies for ecological risk. It was shown, using the toxic units approach (Sect. 3.2-3), that the Lurgi/Fischer-Tropsch effluent has a somewhat greater potential for acute toxicity to fish. A similar conclusion can be reached by inspecting Table 5.1-1. The differences between the two processes appear to be less important than their similarities. For both, conventional pollutants, especially acid gases (RAC 4) and ammonia (RAC 5), appear to be substantially more hazardous than the complex organic contaminants usually associated with synfuels.

5.2 EVALUATION OF RISKS OF ALGAL BLOOMS

Algal toxicity data were available for only ten RACs. Moreover, because of the diversity of experimental designs and test endpoints used in algal bioassays, it is not meaningful to rank the RACs using the quotient method. Finally, as noted in Sect. 3.1, there is no clear distinction between acute effects and chronic effects in algal bioassays.

It does appear, however, that most of the quotients that can be calculated are lower for algae than for fish; only RACs 33 and 34 would be judged significant for any technology using the quotient method.

Ecosystem uncertainty analysis suggests greater risks of effects on algae than does the quotient method. Risks of 10% or more of a fourfold increase in algal biomass for one or more technologies were estimated for six of the nine RACs examined: 5, 31, 32, 33, 34, and 35. The effects pathway postulated in ecosystem uncertainty analysis is indirect rather than direct. All of the RACs are toxic to algae. The increases in algal biomass are caused by reductions in grazing intensity related to the effects of contaminants on zooplankton and fish.

5.3 EVALUATION OF RISKS TO VEGETATION AND WILDLIFE

The greatest threat to terrestrial biota from indirect coal liquefaction appears to be the gases SO_2 (RAC 2 - sulfur oxides) and NO_2 (RAC 3 - nitrogen oxides). The concentrations of SO_2 for both technologies are near phytotoxic levels. Interactions between these

gases and their combined effects with background ambient pollution deserve additional attention. The effects of acute exposures from "plume strikes" are also likely to be important and deserve attention. Air pollutants do not appear to be a threat to mammalian wildlife, but the sensitivity of nonmammalian species is largely unknown.

Of the materials deposited on the soil, the trace elements arsenic, cadmium, and nickel cause the greatest concern. However, they are unlikely to be a problem except when deposited on soils having preexisting high concentrations of trace elements and chemical properties that favor the solution phase.

5.4 VALIDATION NEEDS

There are no uniquely correct methods of quantifying ecological risks. There are several plausible ways to combine uncertainties concerning differential sensitivities of fish taxa and acute-chronic relationships. Similarly, there are many aquatic ecosystem models, and different models produce different estimates of uncertainty and risk. Validation studies of the methods used in these risk analyses would greatly increase the credibility of the results.

There are two ways in which these synfuels risk analyses can be validated. A specific validation would involve building a synfuels industry and monitoring the resulting environmental effects. A generic validation would involve checking the assumptions and models used in the risk analyses against the results of field and laboratory studies. Given the current state of the synfuels industry, a generic validation seems more practical.

Generic validation of the environmental risk analysis methods would begin with an examination of the capability of existing published evidence to support or refute the models or their component assumptions. To a certain extent, this has been done by us as a part of our methods development (e.g., Suter et al. 1983, Suter and Vaughan 1984), and by others for generally used models such as the Gaussian plume atmospheric dispersion model. However, there has been no systematic consideration of such major assumptions as the validity of

hydroponic phytotoxicity studies nor of the risk analysis methodology as a whole. The results of validation studies would indicate not only the level of confidence that can be placed in environmental risk analyses, but also the research needed for further development and validation of risk analysis methods.

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