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9  
10 Dear Dr. Howard:

11 We are writing in response to your request to the to the World Trade Center Health Program  
12 Scientific/Technical Advisory Committee (WTCHP STAC) to provide an evaluation and  
13 recommendation on whether there is a reasonable scientific basis to support adding uterine  
14 cancer to the List of WTC-Related Health Conditions.

15 The STAC recognizes that the WTC Health Program has established policies and procedures for  
16 the addition of specific types of cancer to the List of WTC-Related Health Conditions based on  
17 four methods, and that the Administrator has determined that uterine cancer does not meet the  
18 criteria based on Methods 1, 2, and 3.

19 We appreciate the opportunity to consider whether there is “reasonable scientific basis to support  
20 adding uterine cancer to the List of WTC-Related Health Conditions” as prescribed under  
21 Method 4. Method 4 relies on findings from other sources of information relevant to 9/11  
22 exposures and the occurrence of cancer, including expert judgment, personal experiences of  
23 STAC members, and comments from the public.

24 The STAC has concluded that there is a reasonable basis for adding uterine cancer to the List of  
25 WTC-related cancers. This conclusion is based on largely on the evidence and principles that  
26 were developed by the STAC in 2012<sup>1</sup> and considered by the Administrator in developing  
27 policies and procedures regarding the addition of specific types of cancer (as defined by body  
28 organ or region) as WTC-related conditions, as well as in subsequent rulemakings and  
29 amendments. In his deliberations, the Administrator has continued to place considerable weight  
30 on the recommendations and evidence provided by the STAC in 2012.<sup>1-7</sup> After nearly a decade of  
31 applying well-conceived and reasonable procedures for adding additional cancer types, the WTC  
32 Health Program finds itself in the unforeseen situation that only one type of cancer, uterine  
33 cancer, is not considered a WTC-related condition. In the current context, it is useful to review  
34 the STAC’s earlier considerations about whether to recommend that all cancers be covered:

35 Arguments in favor of listing cancer as a WTC-related condition “include the presence of  
36 multiple exposures and mixtures with the potential to act synergistically and to produce  
37 unexpected health effects, the major gaps in the data with respect to the range and levels  
38 of carcinogens, the potential for heterogeneous exposures and hot spots representing  
39 exceptionally high or unique exposures both on the WTC site and in surrounding  
40 communities, the potential for bioaccumulation of some of the compounds, limitations of

1 testing for carcinogenicity of many of the 287 agents and chemical groups cited in the  
2 first NIOSH Periodic Review, and the large volume of toxic materials present in the  
3 WTC towers.”<sup>1</sup>

4 Although the 2012 STAC ultimately recommended methods for adding specific cancer types  
5 rather than all cancers, we believe that the arguments for adding all cancers can apply to the  
6 question of whether to include uterine cancer. Other than uterine cancer, all cancer types now are  
7 covered as WTC-related conditions. Mechanisms for carcinogenesis resulting from endogenous  
8 and exogenous exposures are similar for most cancer types. It is therefore highly implausible that  
9 uterine cancer would be the *only* cancer not related to WTC exposures.

10 Several lines of evidence demonstrate that uterine cancer shares common etiologies and  
11 mechanisms for development with other cancers. In reviewing this evidence, we refer to  
12 endometrial rather than uterine cancer as that is the term used in relevant articles.<sup>1</sup> Traditionally  
13 endometrial cancers have been classified into major subtypes; however, while the Type 1 and 2  
14 classifications have provided an important framework for decades, heterogeneity and overlap  
15 between these subtypes has been recognized in recent years.<sup>8</sup> Type 1, which accounts for most  
16 endometrial cancers, consists of estrogen-dependent and low-grade lesions with endometrioid  
17 morphology which often have mutations in the *PTEN* gene.<sup>8,9</sup> Type 1 also frequently involves  
18 mutations in the beta-catenin and *KRAS* genes as well as deficiencies in mismatch repair.<sup>9</sup> The  
19 same mutations and abnormal mismatch repair are associated with many other cancers.  
20 Specifically, *PTEN* inactivation is found in melanoma, brain tumors, ovarian cancer, thyroid  
21 cancer, breast cancer, and prostate cancer; mutations in the beta-catenin gene are found in liver  
22 and colorectal cancers<sup>10</sup>; and *KRAS* mutations are found in non-small cell lung cancer, colorectal  
23 cancer, and pancreatic cancer. Mutations in mismatch repair genes cause hereditary nonpolyposis  
24 colorectal cancer and loss of mismatch repair is associated with a significant fraction of sporadic  
25 cancers.<sup>11</sup> Type 2 endometrial cancer is rarer than Type 1 and contains high-grade lesions of  
26 serous or clear cell histology with frequent mutations in p53 and high expression and/or  
27 amplification of HER2. A p53 gene mutation is the most frequent mutation in human cancer.<sup>9</sup>  
28 HER2/neu is a tyrosine kinase membrane receptor in the epidermal growth factor (EGF) receptor  
29 family. Mutations of this gene are also found in breast and ovarian cancers.<sup>9</sup> The STAC review  
30 of the literature suggests that endometrial cancer shares many of the same genetic mechanisms  
31 with cancers already included in List of WTC-Related Health Conditions.

32 Incidence rates of both endometrial cancer and breast cancer are strongly related to exposure to  
33 endogenous and exogenous hormones and, therefore, exposure to endocrine-disrupting chemicals  
34 (EDCs) in WTC dust are particularly relevant for these cancers. Estrogen receptor (ER),  
35 progesterone receptor (PR) human epidermal growth factor 2 (HER2) overexpression are well  
36 recognized prognostic and predictive markers for breast cancer. Although the roles of ER, PR,  
37 and HER2 expression in endometrial cancer are less well understood, a recent study of

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<sup>1</sup> Endometrial cancer is the most common type of uterine cancer, and the terms are sometimes used synonymously. Most of the scientific literature on uterine cancer relates specifically to endometrial cancer. However, in keeping with Dr. Howard’s charge, the STAC recommendations pertain to all uterine cancers, which is the more inclusive term. The STAC also recognizes that uterine sarcomas, which are the second most common type of uterine cancers, are considered rare cancers and are already considered WTC-Related Health Conditions.

1 biomarker expression in tissue samples from 360 women with endometrial cancer found that,  
2 among Type I tumors, 92.7% were positive for ER and 85.1% were positive for PR expression;  
3 smaller but significant proportions of Type II cancers were also ER- and PR-positive.<sup>12</sup>

4 The risks of developing breast and endometrial cancer are related to reproductive factors and  
5 hormonal therapies, and risks may vary by the age and stage of development at which the  
6 exposure occurred. Because endometrial cancers are clearly related to hormonal factors, the  
7 presence of multiple EDCs at the WTC site is of special significance in evaluating risks  
8 associated with WTC exposures. In supporting documents to the 2012 STAC Committee  
9 recommendations,<sup>1</sup> the Committee focused on several classes of WTC exposures which have  
10 substantial evidence regarding cancer in animals and humans. These include asbestos, polycyclic  
11 aromatic hydrocarbons (PAHs), polychlorinated biphenyls, dioxins and furans, metals, and  
12 volatile and semi-volatile organic compounds (VOCs). In this report, we provide additional  
13 evidence regarding the presence and toxicity of EDCs in WTC dust. EDCs present at the WTC  
14 site included cadmium, perfluoroalkyl substances, phthalates, polybrominated diphenyl ethers  
15 (PBDEs), polychlorinated biphenyls (PCBs), polychlorinated dibenzo-para-dioxins, and  
16 polychlorinated dibenzofurans (PCDD/Fs).<sup>13</sup> Although data on the carcinogenicity of many of  
17 these substances in experimental animals and humans are extremely limited, recent review  
18 articles address the potential relationship between endocrine disruption and endometrial  
19 cancer.<sup>14,15</sup> In addition, there is evidence that exposure to some EDCs in-utero and during early  
20 life are particularly hazardous, thus posing potential risks for uterine cancer among survivors  
21 with early life exposures. Exposure to diethylstilbestrol (DES) resulted in clear cell  
22 adenocarcinoma of the vagina and other reproductive abnormalities in adolescents and young  
23 adults who were exposed as fetuses, and increased risk of breast cancer among pregnant women  
24 who took the drug; the DES experience is one well-known example showing consequences of  
25 EDC exposure after long latency periods.<sup>16</sup> Reproductive abnormalities also occurred in  
26 grandchildren of women who took DES during pregnancy.<sup>16</sup> These data raise concern for the  
27 young people who attended schools and childcare centers in the WTC area, as well as area  
28 residents who were infants, children, adolescents, and young adults during the attack. These  
29 individuals have decades of life ahead during which they may experience effects of their earlier  
30 exposures.

31 The STAC provides additional documentation regarding potential exposures to EDCs at the  
32 WTC site in Attachment 1.

33 The STAC recognizes that increases in uterine cancer risk have not been observed in studies of  
34 WTC-exposed cohorts to date,<sup>17</sup> but believes that these studies may not be able to provide  
35 definitive evidence for associations of uterine cancer with WTC exposures now or in the future.  
36 Although the incidence rate of uterine cancer exceeds the threshold used by the Administrator to  
37 define rare cancers, because of the relatively small numbers of women in WTC cohorts, similar  
38 statistical power constraints apply to uterine cancer. In addition to the limited statistical power  
39 for generating overall estimates of risk, these small numbers limit the ability to evaluate  
40 exposure-response or to conduct highly relevant analyses by histological type, menopausal  
41 status, age at exposure, age at diagnosis, and other factors that may be critically important in

1 investigating endometrial cancer risk. Many women in the cohorts under study are only now  
2 reaching the ages at which peak incidence of uterine cancer occurs in the population, so it is  
3 possible that elevated uterine cancer risks are yet to be observed.

4 Although none of the WTC carcinogenic agents reviewed in the WTCHP white paper have been  
5 found by IARC to be associated with uterine cancer, the epidemiologic evidence regarding these  
6 cancers comes primarily from studies of industrial cohorts, which often include very few or no  
7 women and therefore would be unable to detect an increased risk if it were present.<sup>17</sup> The STAC  
8 also recognizes that many epidemiological studies of these agents have significant limitations in  
9 sample size and methodology and do not account for other important risk determinants such as  
10 age at exposure and reproductive risk factors.

11 Prior decisions made by the Administrator have articulated the importance of balancing the  
12 degree of certainty regarding cancer associations with the importance of providing timely  
13 services to affected responders and survivors. The STAC has considered public comments from  
14 affected survivors, responders, and health care providers from WTCHP Centers of Excellence.  
15 Many comments reflect the perception that coverage of all types of cancer except uterine cancer  
16 as WTC-Related Health Conditions is illogical and unfair and may cause tangible harm. One  
17 such harm is that women diagnosed with uterine cancers may experience poorer health outcomes  
18 than their peers whose cancers are considered WTC-related. A recent study found better cancer  
19 survival among responders enrolled in WTC Medical Monitoring and Treatment Programs  
20 compared to the general population.<sup>18</sup> While some of these benefits may accrue from screening  
21 and diagnostic benefits, it is likely that coverage for treatment and access to high quality care  
22 among those with WTC-related cancers contribute to better outcomes. In addition, in public  
23 comments, WTC-exposed women who have been diagnosed with uterine cancer have stated that  
24 the lack of the social and clinical support and recognition that uterine cancer is a WTC-related  
25 condition has had a significant negative impact on their morale and quality of life.

26 The STAC has also considered comments from WTCHP providers who are ethically conflicted  
27 and deeply troubled by their role of explaining to individuals with uterine cancer that they are not  
28 eligible for benefits because their form of cancer is the only one not covered. The STAC notes  
29 the strong support of WTCHP Center directors and providers for inclusion of uterine cancer as a  
30 WTC-related condition, as well as comments from the public and STAC members who are or  
31 have been WTCHP providers.

32 The STAC believes that the WTC Environmental Health Center Pan-Cancer Database will be an  
33 important tool for research on cancer in WTC survivors. This database contains information on  
34 cancer characteristics and emerging biomarkers for cancers in individuals enrolled in the WTC  
35 Environmental Health Centers.<sup>19</sup> The database does not appear to include uterine cancer, thus  
36 closing the door to future research that might provide greater insights into the role of WTC  
37 exposures for development of these cancers. Such research will be particularly important in  
38 identifying risks associated with less common histologic subtypes of uterine cancer, such as clear  
39 cell carcinoma, a diagnosis mentioned in several public comments.

1 In view of the strong rationale for adding uterine cancer to the list of WTC-related cancers and  
2 the potential benefits to affected WTC responders, WTC survivors, and providers caring for  
3 these patients, we recommend that uterine cancer be added to the list of WTC-related cancers  
4 and urge the Administrator to make all feasible efforts to do so as quickly as policies and  
5 procedures allow.

6 We appreciate the opportunity to consider this important issue and would be happy to provide  
7 clarification or respond to any questions you may have.

8

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Sincerely,

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Elizabeth Ward, PhD.  
Chair, World Trade Center Health Program  
Scientific/Technical Advisory Committee

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1 Attachment 1: Supporting documentation for the Committee's recommendation

2 1. The STAC's understanding of WTC exposures

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4 In developing the 2012 recommendation that certain cancers be listed as WTC-related  
5 conditions, the STAC investigated and described potential exposures at the site. Our  
6 understanding of the nature of these exposures provides an important foundation of the current  
7 STAC recommendation regarding uterine cancer:

8 “The collapse of the World Trade Center produced a dense dust and smoke cloud  
9 containing gypsum from wallboard, plastics, cement, fibrous glass, asbestos insulation,  
10 metals, and volatile and semi- volatile organic compounds and other products of high-  
11 temperature combustion from burning jet fuel, heating oil, transformer oil and  
12 gasoline.<sup>20,21</sup> Individuals caught in the dust cloud on 9/11 and working on or near the site  
13 in the days immediately following the attack experienced intense acute exposures to a  
14 mixture of substances whose concentration and composition was not measured and will  
15 never be fully known. However, it is known that the dust was highly alkaline, due to  
16 pulverized cement and other construction materials, and contained numerous particles,  
17 fibers and glass shards, resulting in acute eye, nose and throat irritation, leading rapidly to  
18 what came to be known as WTC cough. Smoke from fires that persisted into December  
19 2001 contained polycyclic aromatic hydrocarbons, metals, organic chemicals and many  
20 other known or potential carcinogens. Heavy equipment and trucks contributed diesel  
21 emissions, and there was repeated resuspension of sediment and dust during the  
22 subsequent 10- month demolition and cleanup process. Although levels of airborne  
23 contaminants were not measured in the first four days, the high prevalence of acute and  
24 chronic respiratory conditions in rescue, recovery, clean up and restoration workers  
25 provides evidence for significant exposure levels and toxicity.<sup>22</sup>

26 “Although some of the dust and smoke was carried away into higher levels of the  
27 atmosphere, significant amounts settled in surrounding streets, residences, and office  
28 buildings. Dust entered buildings through broken windows, open windows, and air  
29 intakes, and highly respirable particles entered through closed windows. Many residents  
30 returned to homes that were highly contaminated and/or not adequately remediated. Area  
31 residents and workers exposed to WTC dust have also been affected by chronic  
32 respiratory diseases, including newly diagnosed asthma and asthma exacerbation.<sup>23</sup>

33 “Members of the STAC and individuals providing public comments have noted that  
34 exposures resulting from collapse of the World Trade Center were unlike any other  
35 exposures in intensity and variety in history. We believe that to be the case, both because  
36 of the enormous forces that pulverized the buildings and their contents, and the  
37 combustion products generated by the high-temperature fires. Compounding the  
38 uniqueness of the exposures is the absence of any data on air contaminant levels or the  
39 composition of the dust and fumes in the first four days after the attack, and the presence  
40 of multiple and complex exposures. However, while acknowledging these unknown and  
41 unknowable factors, we believe that it is possible to make some judgments about the

1 potential increased risks of developing some cancers based on the substances known to  
2 have been present. This information can be gleaned from a variety of sources, including  
3 peer-reviewed literature, government reports and unpublished reports from private  
4 laboratories and contractors.

5 “Based on these reports, the committee believes that both responder populations and area  
6 residents and workers had potential for significant exposures to toxic and carcinogenic  
7 components of WTC dust and smoke. Factors that influence the intensity of exposures  
8 among individuals engaged in rescue, recovery, demolition, debris cleanup and/or other  
9 related services include the time and date of arrival at the WTC site and other areas where  
10 WTC materials were transported or stored, total days and hours worked, specific jobs  
11 performed, breathing rates, work locations, particularly work in areas of smoldering fires,  
12 and availability and use of personal protective equipment and other controls.

13 “Especially in the early period of rescue and recovery, many individuals worked long  
14 shifts without adequate respiratory protection and in clothing saturated with dust from the  
15 debris, likely experiencing significant exposures through inhalation, ingestion, and skin  
16 absorption. Although these exposures may be considered relatively brief compared to  
17 longer exposures typically associated with occupational cancer, many individuals had  
18 high-intensity exposures, especially in the early weeks, and many continued to work in  
19 the area for weeks and months.

20 “Exposures among community residents and those working and attending school in the  
21 area also have the potential to be significant, although in many ways they may be even  
22 more difficult to categorize than those of responders. Some residents were not evacuated;  
23 some individuals returned within days of the disaster to grossly dust-contaminated homes  
24 that they cleaned themselves; others returned to homes with less visible contamination  
25 that were later found to contain high levels of asbestos and other toxic substances.<sup>24</sup>  
26 Many government offices are housed in buildings below Canal Street, and many workers  
27 were required to return before any decontamination or cleaning took place and without  
28 personal protective equipment. Others worked, attended school, or lived near sites where  
29 debris was transported or transferred in processes that continued to generate dusts. Still  
30 others volunteered in support activities near the site as well as residing in the community.  
31 Residential, office and school building exposures have the potential to be of longer  
32 duration than those among workers at the site if the buildings and occupied spaces were  
33 not properly remediated. Longer, lower-level exposures may be a particular issue for  
34 individuals with preexisting asthma and allergies and those who are already sensitized to  
35 dust contaminants such as nickel and hexavalent chromium. Children in contaminated  
36 homes, daycare settings and schools have greater exposure potential than adults due to  
37 crawling on floors, hand-to-mouth activities and higher respiratory rates, and may also be  
38 more susceptible to mutagens and carcinogens due to growth and rapid cell turnover.”<sup>1</sup>

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2. The STAC’s understanding of potential exposures to endocrine-disrupting chemicals (EDCs) at the WTC site and their potential role in causing endometrial cancers

In discussing the potential that WTC exposures may cause cancer in 2012, the STAC focused on classes of agents for which there was substantial evidence regarding cancer in animals and humans. These included asbestos, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls, dioxins and furans, metals, and volatile and semi-volatile organic compounds (VOCs). Although some of these agents are EDCs, in its 2012 report the STAC did not specifically review this category of agents, which are of particular importance in evaluating WTC exposures that may be related to uterine cancer.<sup>1</sup>

As defined by The Endocrine Society: “An endocrine-disrupting chemical (EDC) is an exogenous chemical, or mixture of chemicals, that can interfere with any aspect of hormone action. The potential for deleterious effects of EDC must be considered relative to the regulation of hormone synthesis, secretion, and actions and the variability in regulation of these events across the life cycle. The developmental age at which EDC exposures occur is a critical consideration in understanding their effects. Because endocrine systems exhibit tissue-, cell-, and receptor-specific actions during the life cycle, EDC can produce complex, mosaic effects.”<sup>25</sup>

Studying the potential health effects of exposure to EDCs is inherently challenging and much remains unknown despite decade of research. As described in a recent review: “Because they have multiple mechanisms of action, EDCs can act simultaneously at the level of the receptor, hormone synthesis, and hormone degradation. This can lead, for example, to estrogenic or antiandrogenic effects, sometimes creating integrated estrogenic signals not predicted by studying each action alone. Further complicating research, compounds that alter thyroid signaling can affect the actions of other hormones or EDCs. If EDCs interact like hormones, the most sensitive endpoint can change depending on the endocrine-active compounds present and even their pattern of exposure. The long time period between early exposures and the development of disease later in life makes it challenging to trace morbidity due to EDC exposure; this pattern is further complicated by the potential effects of developmental “windows of susceptibility,” when any endocrine perturbation can have important effects.”<sup>26</sup> A characteristic of EDCs is that they can act at very low levels of exposure, often showing a nonmonotonic exposure response curve with greater effects at very low and high doses.<sup>26</sup>

Disturbance of the balance in sex steroid hormones resulting from EDC exposure is a plausible mechanism for the development of endometrial cancer among WTC responders and survivors. Imbalances in sex steroid hormones producing excess stimulation of endometrial epithelium by estrogen relative to progesterone are thought to play a critical role in the etiology of endometrial carcinomas. Estrogen, when insufficiently opposed by progesterone, has proliferative effects on the endometrium, which may result in a higher probability of random mutations in oncogenes and tumor suppressor genes. Endometrial cells that acquire multiple mutations without appropriate repair mechanisms may gain a growth advantage and develop into clones of cancer cells.<sup>27</sup> Although the relationship between exposure to EDCs and endometrial cancer risk is

1 highly plausible, for the reasons described above, epidemiological studies have limited ability to  
2 detect such these complex associations. Hormonally related cancers which are potential target  
3 organs for carcinogenesis related to EDC exposures include thyroid cancer, breast cancer,  
4 testicular and prostate cancer, and all cancers of the female reproductive tract, all of which  
5 except for uterine cancer are considered WTC-related conditions.

6 Based on the inventory of 9/11 agents,<sup>13</sup> EDCs present the WTC site include cadmium,  
7 perfluoroalkyl substances, phthalates, polybrominated diphenyl ethers (PBDEs), polychlorinated  
8 biphenyls (PCBs), polychlorinated dibenzo-para-dioxins, and polychlorinated dibenzofurans  
9 (PCDD/Fs). In the analyses of settled dust and smoke samples collected in the first days after the  
10 collapse and fire, levels of PCBs, benzo-p-dioxins (PCDDs), and dibenzofurans (PCDFs) were in  
11 the nanograms per gram (ng/g) and picograms per gram (pg/g) range. Levels of PBDEs were in  
12 the micrograms per gram ( $\mu\text{g/g}$ ) range.<sup>20</sup> Samples of ambient organic films deposited on exterior  
13 window surfaces from lower Manhattan and Brooklyn in New York City collected six weeks  
14 after 9/11 found orders of magnitude higher levels of PCDD/Fs compared to a background site  
15 3.5 km away in Brooklyn.<sup>28</sup> Ash-laden runoff samples collected in Rector Street on 9/14 and  
16 9/20 also demonstrated the release of PCBs, PBDEs, polybrominated dibenzo-para-dioxins and  
17 PBDD/Fs from the incident.<sup>29</sup>

18  
19 Among the biomonitoring studies available to the STAC, two provide the clearest evidence for  
20 EDC exposure at the WTC site. A study of perfluorochemicals in plasma collected from New  
21 York State and National Guard personnel working in the vicinity of the WTC between  
22 September 11 and December 23, 2001 found that levels of perfluorooctanoic acid (PFOA) and  
23 perfluorohexanesulfonate (PFHxS) were approximately 2 times higher in WTC responders  
24 compared to the U.S. general population.<sup>30</sup> A study conducted among 110 adolescents who lived,  
25 attended school, or were present in lower Manhattan on 9/11 recruited from the WTC Health  
26 Registry (WTCHR) and unexposed youths found that median PCDD/F levels were statistically  
27 significantly higher among WTCHR participants compared to non-WTCHR participants for 16  
28 out of 17 congeners. Mean and median TEQ concentrations in WTCHR participants were more  
29 than 7 times those in non-WTCHR participants (72.5 vs. 10.1 and 25.3 vs. 3.39  $\text{pg/g}$  lipid,  
30 respectively).<sup>31</sup>

31  
32 The potential toxicity of the high concentrations of PBDEs in WTC dust has received less  
33 attention than the presence and toxicity of other EDCs. Due to their bio persistence and toxicity,  
34 pentaBDE and octaBDE mixtures were voluntarily withdrawn from the U.S. marketplace by  
35 their manufacturers at the end of 2004, and decaBDE was not allowed to be manufactured or  
36 imported into the U.S. after December 31, 2013. Prior to their withdrawal from the market, the  
37 main use of decaBDE was for electronic enclosures, such as television cabinets, octaBDE was  
38 largely used in plastics for business equipment, and pentaBDE was principally used in foam for  
39 cushioning in upholstery, all of which were present in large quantities in WTC offices. PBDEs  
40 have been strongly associated with developmental neurotoxicity and thyroid hormone disruption,  
41 and recent studies in animals have shown that PBDEs interfere with estrogen- and androgen-  
42 mediated processes.<sup>32</sup> The highest concentration of PBDEs in WTC dust was for BDE-209  
43 (3,3',4,4',5,5',6,6'-decabromodiphenyl ether), ranging from 1,330  $\mu\text{g/g}$  at Sherry Street to 2,330

1  $\mu\text{g/g}$  at Market Street; concentrations of BDE-47 (2,2',4,4'-tetrabromodiphenyl ether) ranged  
2 from 107  $\mu\text{g/g}$  at Cortlandt Street to 174  $\mu\text{g/g}$  at Market Street.<sup>20</sup> These concentrations are  
3 approximately 100 to 1000 times higher than levels of BDE-47 and BDE-209 measured in  
4 studies of dusts collected in U.S. residences during 2011 to 2014, which ranged from 1051 to  
5 4204 ng/g for BDE-209 and 224-870 ng/g for BDE-47.<sup>33</sup>

6 The high levels of PBDEs in WTC dust are of substantial concern with respect to developmental  
7 effects as well as carcinogenicity. In 2009, the EPA released an Action Plan stating the concern  
8 that some PBDE congeners are persistent, bioaccumulative and toxic and that it intends to  
9 initiate a number of actions to limit the exposure and release of PBDE congeners and/or articles  
10 to which they have been added.<sup>34</sup> The EPA summarized animal studies of various commercial  
11 mixtures and individual congeners which suggested potential concerns about liver toxicity,  
12 thyroid toxicity, developmental toxicity, and developmental neurotoxicity. They stated that these  
13 findings and the presence of PBDEs in house dust and breast milk raise particular concerns about  
14 potential risks to children. In 2008, EPA published toxicological reviews of four PBDE  
15 congeners: tetraBDE (BDE-47), pentaBDE (BDE-99), hexaBDE (BDE-153), and decaBDE  
16 (BDE-209). Neurobehavioral effects were identified as the critical endpoint of concern for each  
17 of the four congeners. For decaBDE, EPA also proposed that the data support a finding of  
18 "suggestive evidence of carcinogenic potential".<sup>34</sup>

19 While there is no direct evidence relating the high levels of PBDEs in WTC dust to uterine  
20 cancer, some toxicologic studies provide indirect evidence for such an association. One study  
21 found that BDE-209 increased the viability and proliferation of cells in several types of cancer,  
22 including breast cancer, cervical cancer, and ovarian cancer.<sup>35</sup> Another study found that BDE-47  
23 promoted cell growth, migration and chemoresistance of endometrial cancer cells both in vivo  
24 and in vitro.<sup>36</sup>

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## References

1. Letter from Elizabeth Ward (Chair, World Trade Center Scientific Advisory Committee); 3/31/12. <https://www.cdc.gov/niosh/docket/archive/pdfs/NIOSH-248/0248-040212-Letter.pdf>.
2. Addition of Certain Types of Cancer to the List of WTC-Related Health Conditions. Proposed Rule. June 13, 2012. <https://www.govinfo.gov/content/pkg/FR-2012-06-13/pdf/2012-14203.pdf>.
3. Addition of Certain Types of Cancer to the List of WTC-Related Health Conditions, September 12, 2012. <https://www.govinfo.gov/content/pkg/FR-2012-09-12/pdf/2012-22304.pdf>.
4. Certification of Breast Cancer in WTC Responders and Survivors Exposed to PCBs. Notice: Changes in Certification Requirements, April 17, 2013. <https://www.govinfo.gov/content/pkg/FR-2013-04-17/pdf/2013-09003.pdf>.
5. Addition of Prostate Cancer to the List of WTC-Related Health Conditions. Notice of Proposed Rulemaking. July 2, 2013. <https://www.govinfo.gov/content/pkg/FR-2013-07-02/pdf/2013-15816.pdf>.
6. Addition of Prostate Cancer to the list of WTC-Related Health Conditions. September 19, 2013. <https://www.govinfo.gov/content/pkg/FR-2013-09-19/pdf/2013-22800.pdf>.
7. World Trade Center Health Program: Amendments to List of WTC-Related Health Conditions; Cancer; Revision. February 18, 2014. <https://www.govinfo.gov/content/pkg/FR-2014-02-18/pdf/2014-03370.pdf>.
8. Wang C, Tran DA, Fu MZ, Chen W, Fu SW, Li X. Estrogen Receptor, Progesterone Receptor, and HER2 Receptor Markers in Endometrial Cancer. *J Cancer*. 2020;11(7):1693-1701.
9. Banno K, Yanokura M, Iida M, Masuda K, Aoki D. Carcinogenic mechanisms of endometrial cancer: involvement of genetics and epigenetics. *J Obstet Gynaecol Res*. 2014;40(8):1957-1967.
10. Kim S, Jeong S. Mutation Hotspots in the beta-Catenin Gene: Lessons from the Human Cancer Genome Databases. *Mol Cells*. 2019;42(1):8-16.
11. Hsieh P, Yamane K. DNA mismatch repair: molecular mechanism, cancer, and ageing. *Mech Ageing Dev*. 2008;129(7-8):391-407.
12. Watkins JC, Downing MJ, Crous-Bou M, et al. Endometrial Tumor Classification by Histomorphology and Biomarkers in the Nurses' Health Study. *J Cancer Epidemiol*. 2021;2021:8884364.
13. World Trade Center Health Program, Development of the inventory of 9/11 Agents, July 17, 2018. [https://wwwn.cdc.gov/ResearchGateway/Content/pdfs/Development\\_of\\_the\\_Inventory\\_of\\_9-11\\_Agents\\_20180717.pdf](https://wwwn.cdc.gov/ResearchGateway/Content/pdfs/Development_of_the_Inventory_of_9-11_Agents_20180717.pdf), Accessed 10/7/21.
14. Gibson DA, Saunders PT. Endocrine disruption of oestrogen action and female reproductive tract cancers. *Endocr Relat Cancer*. 2014;21(2):T13-31.
15. Mallozzi M, Leone C, Manurita F, Bellati F, Caserta D. Endocrine Disrupting Chemicals and Endometrial Cancer: An Overview of Recent Laboratory Evidence and Epidemiological Studies. *Int J Environ Res Public Health*. 2017;14(3).
16. Zamora-Leon P. Are the Effects of DES Over? A Tragic Lesson from the Past. *Int J Environ Res Public Health*. 2021;18(19).

- 1 17. Scientific Considerations for Potential Addition of Uterine Cancer to the List of Covered  
2 Conditions by the World Trade Center Health Program. Preliminary Assessment for the  
3 World Trade Center Health Program Scientific/Technical Advisory Committee. September  
4 16, 2021.
- 5 18. Goldfarb DG, Zeig-Owens R, Kristjansson D, et al. Cancer survival among World Trade  
6 Center rescue and recovery workers: A collaborative cohort study. *Am J Ind Med.*  
7 2021;64(10):815-826.
- 8 19. Shao Y, Durmus N, Zhang Y, et al. The Development of a WTC Environmental Health  
9 Center Pan-Cancer Database. *Int J Environ Res Public Health.* 2021;18(4).
- 10 20. Liou PJ, Georgopoulos P. The anatomy of the exposures that occurred around the World  
11 Trade Center site: 9/11 and beyond. *Ann N Y Acad Sci.* 2006;1076:54-79.
- 12 21. Liou PJ, Pellizzari E, Prezant D. The World Trade Center aftermath and its effects on  
13 health: understanding and learning through human-exposure science. *Environ Sci*  
14 *Technol.* 2006;40(22):6876-6885.
- 15 22. Aldrich TK, Gustave J, Hall CB, et al. Lung function in rescue workers at the World  
16 Trade Center after 7 years. *N Engl J Med.* 2010;362(14):1263-1272.
- 17 23. Weiden MD, Ferrier N, Nolan A, et al. Obstructive airways disease with air trapping  
18 among firefighters exposed to World Trade Center dust. *Chest.* 2010;137(3):566-574.
- 19 24. Lin S, Jones R, Reibman J, Bowers J, Fitzgerald EF, Hwang SA. Reported respiratory  
20 symptoms and adverse home conditions after 9/11 among residents living near the World  
21 Trade Center. *J Asthma.* 2007;44(4):325-332.
- 22 25. Zoeller RT, Brown TR, Doan LL, et al. Endocrine-disrupting chemicals and public health  
23 protection: a statement of principles from The Endocrine Society. *Endocrinology.*  
24 2012;153(9):4097-4110.
- 25 26. Schug TT, Johnson AF, Birnbaum LS, et al. Minireview: Endocrine Disruptors: Past  
26 Lessons and Future Directions. *Mol Endocrinol.* 2016;30(8):833-847.
- 27 27. Felix AS, Yang HP, Bell DW, Sherman ME, Chapter 1: Epidemiology of Endometrial  
28 Carcinoma: Etiologic Importance of Hormonal and Metabolic Influences. In: L. Hedrick  
29 Ellenson (ed.), *Molecular Genetics of Endometrial Carcinoma, Advances in Experimental*  
30 *Medicine and Biology* 943, Springer International Publishing AG 2017, DOI  
31 10.1007/978-3-319-43139-0\_1.
- 32 28. Rayne S, Ikonomidou MG, Butt CM, Diamond ML, Truong J. Polychlorinated dioxins and  
33 furans from the World Trade Center attacks in exterior window films from lower  
34 Manhattan in New York City. *Environ Sci Technol.* 2005;39(7):1995-2003.
- 35 29. Litten S, McChesney DJ, Hamilton MC, Fowler B. Destruction of the World Trade  
36 Center and PCBs, PBDEs, PCDD/Fs, PBDD/Fs, and chlorinated biphenylenes in water,  
37 sediment, and sewage sludge. *Environ Sci Technol.* 2003;37(24):5502-5510.
- 38 30. Tao L, Kannan K, Aldous KM, Mauer MP, Eadon GA. Biomonitoring of  
39 perfluorochemicals in plasma of New York State personnel responding to the World  
40 Trade Center disaster. *Environ Sci Technol.* 2008;42(9):3472-3478.
- 41 31. Kahn LG, Han X, Koshy TT, et al. Adolescents exposed to the World Trade Center  
42 collapse have elevated serum dioxin and furan concentrations more than 12 years later.  
43 *Environ Int.* 2018;111:268-278.
- 44 32. Czerska M, Zielinski M, Kaminska J, Ligocka D. Effects of polybrominated diphenyl  
45 ethers on thyroid hormone, neurodevelopment and fertility in rodents and humans. *Int J*  
46 *Occup Med Environ Health.* 2013;26(4):498-510.

- 1 33. Cowell WJ, Stapleton HM, Holmes D, et al. Prevalence of historical and replacement  
2 brominated flame retardant chemicals in New York City homes. *Emerg Contam.*  
3 2017;3(1):32-39.
- 4 34. U.S. Environmental Protection Agency. Polybrominated Diphenyl Ethers (PBDEs)  
5 Action Plan. 12/30/2009. [https://www.epa.gov/sites/default/files/2015-  
6 09/documents/pbdes\\_ap\\_2009\\_1230\\_final.pdf](https://www.epa.gov/sites/default/files/2015-09/documents/pbdes_ap_2009_1230_final.pdf).
- 7 35. Li ZH, Liu XY, Wang N, et al. Effects of decabrominated diphenyl ether (PBDE-209) in  
8 regulation of growth and apoptosis of breast, ovarian, and cervical cancer cells. *Environ*  
9 *Health Perspect.* 2012;120(4):541-546.
- 10 36. Zhang F, Peng L, Huang Y, Lin X, Zhou L, Chen J. Chronic BDE-47 Exposure  
11 Aggravates Malignant Phenotypes and Chemoresistance by Activating ERK Through  
12 ERalpha and GPR30 in Endometrial Carcinoma. *Front Oncol.* 2019;9:1079.