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## 1 Metal Bioavailability Models: Current Status, Lessons Learned, Considerations for Regulatory Use,

## 2 and the Path Forward

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- 5 Abstract

6 Since the early 2000s, biotic ligand models and related constructs have been a dominant paradigm 7 for risk assessment of aqueous metals in the environment. We critically review 1) the evidence for 8 the mechanistic approach underlying metal bioavailability models; 2) considerations for the use and 9 refinement of bioavailability-based toxicity models; 3) considerations for the incorporation of metal 10 bioavailability models into environmental quality standards; and 4) some consensus 11 recommendations for developing or applying metal bioavailability models. We note that models 12 developed to date have been particularly challenged to accurately incorporate pH effects because 13 they are unique with multiple possible mechanisms. As such, we doubt it is ever appropriate to lump 14 algae/plant and animal bioavailability models; however, it is often reasonable to lump bioavailability 15 models for animals, although aquatic insects may be an exception. Other recommendations include 16 that data generated for model development should consider equilibrium conditions in exposure 17 designs, including food items in combined waterborne-dietary matched chronic exposures. Some 18 potentially important toxicity-modifying factors are currently not represented in bioavailability 19 models and have received insufficient attention in toxicity testing. Temperature is probably of 20 foremost importance; phosphate is likely important in plant and algae models. Acclimation may 21 result in predictions that err on the side of protection. Striking a balance between comprehensive, 22 mechanistically sound models and simplified approaches is a challenge. If empirical bioavailability 23 tools such as multiple-linear regression models and look-up tables are employed in criteria, they

- 24 should always be informed qualitatively and quantitatively by mechanistic models. If bioavailability
- 25 models are to be used in environmental regulation, ongoing support and availability for use of the
- 26 models in the public domain are essential.

### 27 EVIDENCE FOR THE MECHANISTIC APPROACH

- 28 In 1996, the Society of Environmental Toxicology and Chemistry (SETAC) held a workshop to evaluate
- 29 how regulatory criteria for protecting aquatic life could better reflect the science of metal
- 30 bioavailability and toxicology (Bergman and Dorward-King 1997). This was followed by an irruption
- of publications on biotic ligand models (BLMs), related mechanistic or quasi-mechanistic models, and
- 32 simpler empirical approaches such as multiple linear regression (MLR) models. Although some of
- 33 these bioavailability models have been incorporated into regulatory frameworks, many jurisdictions
- 34 retain 1980s vintage criteria. In December 2017, SETAC sponsored a follow-up workshop titled
- 35 Bioavailability-Based Aquatic Toxicity Models for Metals in Pensacola, Florida, USA. The purpose of
- 36 the workshop was to consider the status of different modeling approaches for predicting the
- 37 bioavailability and toxicity of metals in freshwaters and their incorporation into regulatory water
- quality criteria. This is one of 5 articles that evaluated the performance of the models and sought to identify best practices in the use of these models for developing and applying bioavailability-based
- 40 criteria, benchmarks, or guidelines for metals that are intended to protect aquatic life (Adams et al.
- 41 2020; Brix et al. 2020; Garman et al. 2020; Van Genderen et al. 2020).
- 42 The concept of mechanistic models incorporating metal bioavailability as a key factor governing
- 43 toxicity (Paquin et al. 2002; Niyogi and Wood 2004) can be traced back to early experimental studies.
- 44 These studies established that toxicity could vary considerably according to the water chemistry,

45 reflecting influences of factors such as salinity, pH, hardness (i.e., Ca + Mg concentration), alkalinity, 46 and dissolved organic matter (DOM; Jones 1938; Holm-Jensen 1948; Lloyd and Herbert 1962; Zitko 47 et al. 1973). Today we recognize that these factors reflect competition by naturally occurring cations (e.g., Ca<sup>2+</sup>, Mg<sup>2+</sup>, Na<sup>+</sup>, H<sup>+</sup>) for the binding of free metal cations (Me<sup>n+</sup>) to ligands on target organisms 48 and complexation of these Me<sup>n+</sup> ions by waterborne anions (e.g., HCO<sub>3</sub><sup>-</sup>, Cl<sup>-</sup>, and most importantly 49 50 DOM). In both cases, the binding of the metal to ligands on the organism is decreased, thereby 51 offering protection. The first regulatory tools incorporating this bioavailability concept proposed 52 different ambient water quality criteria (AWQC) for freshwater and sea water and, in freshwater, 53 applied hardness as the key factor modifying metal toxicity (e.g., Alabaster and Lloyd 1980; US 54 Environmental Protection Agency 1986; Canadian Council of Ministers of the Environment 2007). 55 These approaches were empirically based and either proposed different AWQC for waters in 56 different hardness ranges or else used equations to adjust AWQC for hardness (US Environmental 57 Protection Agency 1986). The latter were forerunners to the current MLR models that incorporate 58 multiple toxicity-modifying factors (Brix et al. 2017a, 2020). In hindsight, it is now clear that hardness 59 was often a surrogate for other water chemistry variables (e.g., alkalinity, specific ions, pH), which 60 may have been equally or more important in the regression data sets that were used to derive these 61 AWQCs and that another crucial water chemistry variable (DOM) was completely overlooked.

62 Pagenkopf (1983) presented the first mechanistic model, the gill surface interaction model (GSIM). 63 This recognized that metals could bind to biological ligands on the respiratory surfaces of target 64 organisms, thereby causing toxicity. The GSIM postulated that toxicity was attributable to free metal 65 ions (Me<sup>n+</sup>) and used trace metal speciation, gill surface interaction, and competitive inhibition to 66 explain the protective effect of water hardness. The model also recognized that pH and alkalinity 67 influenced metal speciation and that inorganic anions (the role of DOM was curiously discounted) 68 could complex metals, decreasing their bioavailability. These reactions, including those at the gills, 69 were assigned conditional equilibrium constant (log K) values, and steady-state conditions were 70 assumed, allowing prediction of toxicity through equilibrium modeling. Almost simultaneously, 71 Morel (1983) formulated the free ion activity model (FIAM), which focused on algae and made very 72 similar assumptions to the GSIM but in addition recognized the importance of DOM in complexation 73 reactions. Again, a similar geochemical modeling framework was used, and chemical equilibrium was 74 assumed. In both the GSIM and the FIAM, the degree of toxic response was related to the fraction of 75 sites to which Me<sup>n+</sup> was bound, a concept that became a key component of future models. The GSIM 76 and the FIAM can be considered the parents of modern bioavailability models such as the BLM. In 77 this same era, the advent of geochemical modeling programs (e.g., MINEQL+, MINTEQA2) facilitated 78 further progress. Subsequently, the development of the Windermere Humic Aqueous Model 79 (WHAM) (Tipping 1994) incorporated multisite binding to deal with metal interactions with DOM, an

80 important breakthrough.

81 Pagenkopf (1983) had proposed that the cause of lethality when Me<sup>n+</sup> bound to critical sites on the 82 gill surface was respiratory toxicity. However, many studies over the next 2 decades demonstrated 83 that the proximate cause of lethality was interference with the active branchial uptake of either Na 84 (Cu, Ag) or Ca (Zn, Cd, Co, Pb) from the water, at least for fish at metal levels causing acute toxicity 85 (Paquin et al. 2002; Niyogi and Wood 2004). These were associated with inhibition of basolateral Na<sup>+</sup>, K<sup>+</sup>-ATPase (for Na uptake) and Ca<sup>2+</sup>-ATPase (for Ca uptake), as well as blockade of apical Na<sup>+</sup> and 86 87 Ca<sup>2+</sup> channels, and were compounded by increased diffusive losses of these major nutrient ions at 88 higher metal concentrations. Thus, different metals targeted different specific sites (transport 89 proteins) on the gills, and measurements of net Na or Ca loss rates to the water or net decreases in 90 plasma or whole-body concentrations provided physiological evidence for this mechanism of 91 toxicity.

92 Subsequently, Playle and colleagues made a major conceptual breakthrough based on experiments 93 with fathead minnow and trout exposed to Cu or Ag (targeting Na transport sites) and Cd (targeting 94 Ca transport sites) in ion-poor synthetic soft water of defined composition (Playle et al. 1993a, 95 1993b; Janes and Playle 1995). Natural DOM decreased the binding of metals to the gills. Through 96 the analysis of gill metal burdens, the use of competitive waterborne ligands with known log K 97 values, Langmuir isotherm analysis, and a geochemical modeling program (MINEQL+), they were 98 able to estimate distinct log K (affinity) and Bmax (site density = capacity) values for these metals at 99 the gills in short-term exposures (2–3 h). Calculated metal accumulation on gills correlated well with 100 measured gill metal concentrations and adverse physiological effects (e.g., Na loss attributable to 101 Ag) in a number of different field-collected waters. These gill accumulation experiments likely reflect 102 correlates to the true accumulation on the "biotic ligand," for there is a wide range of possible 103 binding sites on a gill surface (including excreted mucus), with a wide spectrum of affinities for different metals. Although it is incorrect to think that by "titrating" a gill surface one can expect to 104 105 probe and characterize the "biotic ligand," the strong relationships between short-term gill metal 106 accumulation and toxicity gave operational support to gill-binding modeling.

107 The gill-binding model for Ag (Janes and Playle 1995) was later transformed into a physiologically 108 based BLM by relating the gill Ag burden on trout to the fractional inhibition of gill Na<sup>+</sup>, K<sup>+</sup>-ATPase 109 activity associated with 96-h mortality (McGeer et al. 2000). This work provided the mechanistic step 110 from short-term gill metal accumulation to the proximate cause of acute toxicity. Similar studies by 111 MacRae et al. (1999) with trout more rigorously demonstrated that short-term gill metal 112 accumulation (in this case Cu at 24 h of exposure) was a constant predictor of acute toxicity (in this 113 case percentage of mortality at 120 h) among a range of test media containing different copperbinding ligands. In fathead minnow, Meyer et al. (1999) demonstrated elegantly that the gill burden 114 115 of Ni at 24 h associated with 50% mortality at 96 h was constant over a range of water qualities, 116 even though the concentration of the free Ni<sup>2+</sup> ion associated with 50% mortality was not. From 117 these studies arose the concept of the LA50, the short-term accumulation at the biotic ligand that is 118 predictive of 50% mortality at a later time. This is a key component of all BLMs, now more commonly 119 known as the intrinsic sensitivity parameter, which can be varied in model fitting to compensate for 120 differences in sensitivity among species, strains, and clones. The gill log K, Bmax, and LA50 concepts still underpin all modern BLMs. The terminology varies, with the gill accumulation log K values often 121 122 referred to as biotic ligand log K values because gills are not the sole site of ion exchange in small 123 animals such as cladocerans, and plants obviously do not have gills. Likewise, LA50s can be related to 124 fractional effects other than 50% or to sublethal endpoints, and thus the LA50 term is often replaced 125 by the more general term for a critical accumulation associated with x% effects (CAx). But despite 126 the varied (and sometimes confusing) terminology, the underlying concepts are fundamentally 127 similar.

128 Building on these early results, subsequent investigations have successfully correlated short-term gill 129 metal accumulation with toxic effects in longer-term exposures for a variety of metals (Table 1). For 130 example, Figure 1 shows how measured gill Ag accumulation (first bar in each pair) can be predicted 131 in 2 forms (Ag<sup>+</sup> and AgCl; second bar) as a function of water chemistry (dissolved organic carbon 132 [DOC], Cl, Na, Ca, pH) using a chemical equilibrium model (Paquin and Di Toro 2008). Toxicity data 133 were then used to evaluate the expected LA50, and the derived BLM could then be used in 134 combination with the LA50 to predict dissolved Ag median lethal concentrations (LC50s) over a wide 135 range of water quality characteristics (Figure 2).

Moving from models based on physiological mechanisms and gill metal burdens to models based ontoxicity only

- A SETAC Pellston Workshop in Pensacola in 1996, and the subsequent book that arose from it
   (Bergman and Dorward-King 1997), greatly accelerated the pace of BLM development. Thereafter,
- 140 landmark publications by Paquin et al. (2000), Di Toro et al. (2001), and Santore et al. (2001) laid out
- 141 the formal technical framework for the BLM and demonstrated its utility in predicting acute toxicity
- of Cu and Ag to fish (e.g., Figure 2) and invertebrates in a range of natural waters. Although these
- 143 papers were firmly rooted in the concept that the short-term metal burden on the biotic ligand was
- the key factor causing longer-term toxicity, they showed that this quantity did not have to be
- 145 measured but rather could be back-calculated (if required) from toxicity data for the purpose of
- 146 model generation. The extensive results of Erickson et al. (1996) on acute Cu toxicity to fathead
- 147 minnow where single water chemistry parameters were varied, one at a time, provided the key data
- 148 used to illustrate this principle.
- 149 Relative to the number of BLMs developed since that time, there are relatively few studies where 150 the physiological mechanisms (e.g., gill enzyme inhibition, ion loss) and/or surrogates for the actual 151 metal burden at the biotic ligand (e.g., gill metal concentration) have been measured (see summary 152 in Table 1). This move to model fitting to toxicity data only maintains the conceptual mechanistic 153 framework (that a theoretical critical metal burden at the biotic ligand causes a critical level of 154 toxicity); it has arisen partly as a matter of convenience and partly as a matter of necessity. The 155 former reflects the time-consuming, technically demanding, and costly nature of the measurements, 156 whereas the latter reflects the fact that in many cases the measurements simply cannot be done. 157 Even when metal concentrations in a tissue or an organ are measured, the concentration of metal at 158 the site of toxic action most likely is not the only accumulation being measured. Instead, it is usually 159 assumed that the measured concentration in a tissue or organ is proportional to the currently unmeasurable concentration at the site of action. With Ni, the mechanism of chronic toxicity 160 161 remains unresolved (Brix et al. 2017b); and indeed for most metals, the mechanism(s) of chronic 162 toxicity, and therefore the target biotic ligands, remains poorly understood. Furthermore, the most 163 sensitive organisms which "drive" AWQC are usually very small (e.g., daphnids, snails, algae), in 164 which the biotic ligands are unknown and the metal burdens difficult to measure. However in 165 daphnids, acute Ag toxicity, active Na uptake inhibition, whole-body Na decrement, whole-body Ag burden, and whole-body Na<sup>+</sup>, K<sup>+</sup>-ATPase inhibition were well correlated (Bianchini and Wood 2003); 166 167 and chronic Ag toxicity seemed to result from a failure of Na regulation in both fish (Naddy et al. 168 2007) and daphnids (Bianchini and Wood 2002). These data provide some confidence that the 169 conceptual framework remains valid.
- 170 In approximately 2001, the rate of BLM development was greatly accelerated by the shift from 171 modeling based on gill metal burden/physiological effects to modeling based on toxicity data alone. 172 De Schamphelaere, Janssen, and colleagues have exploited this approach to the greatest extent, 173 particularly for chronic BLMs, which have been in high demand for European regulations (De 174 Schamphelaere and Janssen 2002, 2004a; De Schamphelaere et al. 2005a, 2005b). The chemical 175 submodel remains identical and mechanistic, whereas on the biological/ toxicity side of the model, 176 the implicit mechanistic assumption is that toxicity results faithfully reflect an imaginary metal 177 burden at an imaginary biotic ligand. Studies on chronic (30-d) toxicity of Cu to trout represent one 178 of the rare cases where this assumption has been tested (Ng et al. 2010; Crémazy et al. 2017). These 179 studies concluded that the 24-h gill LA50 predictive of 30-d mortality remained constant from pH 6.0 180 to 8.0 but not at extreme pH values (5.5, 8.5). However, De Schamphelaere et al. (2005b) reported 181 that both surface-bound Cu and internal Cu concentrations were relatively good predictors of chronic toxicity (48–72 h) in algal growth tests across a slightly smaller pH range (5.9–8.5). Possible 182 183 scenarios for such anomalous effects at extreme pH values are explored in the section Dealing with 184 extreme waters. Regardless, if the model is calibrated with data in the water chemistry range of

- 185 interest (and hybrid model strategies for doing so are outlined in the section *Complexity versus*
- 186 simplicity: Use of mechanistic and hybrid models to inform development of simpler models), the
- 187 model predictions should be reliable.

#### 188 Incorporating dietary metal exposure into bioavailability models: The importance of equilibration

189 The question of whether chronic toxicity of metals in aquatic environments is the result of 190 waterborne, dietary, or combined exposures has generated much study and extensive reviews 191 (Clearwater et al. 2002; Meyer et al. 2005; DeForest and Meyer 2015). In nature, ingestion may be a 192 significant route of metal uptake, and for nutrient metals (e.g., Cu, Fe, Zn) it is undoubtedly the 193 major route. Acute models do not take this into account because testing protocols dictate that the 194 organisms must be fasted during the exposure. Because it is almost impossible to envisage a natural 195 situation where dietary metal would cause acute toxicity to aquatic organisms, this is not an issue of 196 concern. However, during chronic exposures, dietary metal may contribute to toxicity or acclimation, 197 and this may occur by both direct (metal poisoning) and indirect (metals affecting the nutritional 198 quality of the diet or causing food aversion) routes (e.g., Irving et al. 2003; Niyogi and Wood 2003; 199 Besser et al. 2005; De Schamphelaere et al. 2007; Golding et al. 2013; Tomczyk et al. 2018). Hook 200 and Fisher (2001, 2002) reported extremely low waterborne effect levels for reproductive 201 impairment when metal-exposed algae (Ag, Hg, Cd, Mn, and Zn) were fed to zooplankton; for Ag, 202 the threshold was below the chronic AWQC. These notable results stimulated subsequent 203 investigations, which confirmed that, in some settings, algae could accumulate metals to harmful 204 levels from low waterborne concentrations (Bielmyer et al. 2006) but, in other settings, metal 205 bioaccumulation occurred without obvious adverse effects (Kolts et al. 2009). Similarly, discordant 206 results were obtained with mayflies fed Cd-exposed algae in repeated experiments (Xie et al. 2010). 207 The reasons for the differing responses are unclear. Further, the literature is not consistent on 208 whether metals incorporated into natural diets by chronic waterborne exposure of the prey 209 organisms are more or less bioavailable than metal salts or prey dipped in metals (DeForest and 210 Meyer 2015).

211 In the real world, we expect that a natural diet will be in some sort of dynamic equilibrium with the 212 metal in the water column. Direct evidence for this is sparse, and metal accumulation studies have 213 shown that time to reach constant tissue burdens ranges from hours for algae to >28 d for predatory 214 insects and oligochaete worms (Timmermans et al. 1992; Stephenson and Turner 1993; Roy and 215 Hare 1999; Meylan et al. 2003). Nevertheless, DeForest and Meyer (2015) argued that "exposure of 216 test organisms to matched water-borne and diet-borne metal concentrations is perhaps the most 217 relevant for evaluating the protectiveness of water-borne metal guidelines." In this context, 218 "matched" means that the test organisms were exposed to the same waterborne-metal 219 concentration to which its food was exposed. This was also a key recommendation of the 2002 220 SETAC Pellston workshop on this topic (Meyer et al. 2005). However, this has rarely been done. 221 There are 2 aspects to this equilibration: 1) physicochemical equilibration reflecting the slow kinetics 222 of diffusion into and sorption onto the food item, which is mainly a concern when dead organisms or 223 artificial food (e.g., trout pellets) are used as the diet—in this case, the same kinetic constraints as 224 for equilibration of metal with DOM will likely apply, a process that can take 24 h or more (see 225 section Equilibrium issues), and 2) biodynamic equilibration (achievement of constant 226 concentrations) with a live diet, where the prey organisms may concentrate the metal many fold 227 above that in the water column, which may take days to weeks.

Two recent studies assessed dietary impacts of Pb with matched waterborne and diet-borne metal
 exposure concentrations. These examined the interactive effects of waterborne and dietary Pb
 exposure in daphnids (*Ceriodaphnia dubia*; Nys et al. 2013) and rainbow trout (Alsop et al. 2016) and

concluded that dietary Pb exposure to these freshwater organisms may not be of concern under thescenarios tested.

233 At present, there is insufficient evidence to conclude that chronic bioavailability models would be 234 underprotective if based on waterborne-only exposures or on combined exposures with insufficient 235 equilibration. Therefore, this should not be a reason for rejecting the large amount of otherwise 236 high-quality data available for use in model generation or for current models that exist based on 237 such data. However, we recommend, for best practice in the future, that during chronic tests 238 combined waterborne and dietary matched exposures should be performed. These should be based 239 on natural live diets that have undergone full biological equilibration with the waterborne metal 240 through pre-exposure. If it becomes apparent during such tests that whole-body and target organ-241 specific metal concentrations are not at equilibrium with ambient metal concentrations in water and 242 food, a biodynamic modeling framework that incorporates uptake (via water and food) and 243 elimination kinetics may be needed.

#### 244 Incorporating behavioral endpoints (e.g., olfaction, mechanoreception) into bioavailability models

245 In most jurisdictions, mortality, growth inhibition, and reproductive inhibition are the only toxicity 246 endpoints that can be used in a regulatory framework. Nevertheless, there is increasing evidence 247 that disruptions of behavior caused by metal exposure may be equally or more sensitive endpoints 248 and that these disruptions are mediated by disturbances in olfaction and/or mechanoreception 249 (reviewed for many metals in Wood et al. 2012a, 2012b). If organisms cannot navigate properly, 250 sense predators or prey, maintain social hierarchies, or find mates, population impacts will likely 251 occur. Furthermore, the limited information available suggests that mechanisms governing olfactory 252 toxicity are rather different from those governing toxicity for other endpoints. For example, for 253 waterborne Cu, inhibitory effects are almost immediate, Ca provides little protection, the log K value 254 for Cu at the olfactory rosette is lower than at the gill, and there is evidence of recovery/acclimation 255 from olfactory inhibition during chronic exposure (e.g., McIntyre et al. 2008; Mirza et al. 2009; Green 256 et al. 2010; Dew et al. 2012). Furthermore, there are different viewpoints (e.g., Green et al. 2010 and 257 Dew et al. 2012 vs Meyer and Adams 2010, DeForest et al. 2011, and Meyer and DeForest 2018) on 258 whether or not mechanistic bioavailability models based on concepts of ionoregulatory disturbance, 259 such as the BLM-based US Cu criterion (US Environmental Protection Agency 2007), are protective 260 against olfactory effects such as behavioral disturbance. If they are protective, it would appear that this is because highly sensitive taxa are included (e.g., cladocerans) for criteria derivation, not 261 262 because the bioavailability models are mechanistically correct for behavioral endpoints (i.e., the 263 comparison is of apples vs oranges). The matter remains unresolved, but moving forward, as argued 264 by Pyle and Wood (2007), we recommend that mechanistically based bioavailability models for 265 behavioral toxicity should be developed. These should be built from the ground up using behavioral 266 endpoints, rather than by adjusting the intrinsic sensitivity parameter in existing BLMs. The areas of 267 agreement and disagreement with models built on traditional endpoints will then be highly 268 informative, and there will be a stronger foundation for deciding whether models based on 269 behavioral endpoints should be used in environmental regulation.

#### 270 CONSIDERATIONS FOR THE USE AND REFINEMENT OF BIOAVAILABILITY-BASED TOXICITY MODELS

- 271 Types of bioavailability-based models currently available
- 272 Table 2 presents a representative summary of available models, but a thorough listing of all models
- 273 would be beyond the scope of this article. The models include classic BLMs that predict acute
- 274 toxicity based on measured accumulations (Table 1); models fitted to acute and chronic toxicity

275 data; models predicting toxicity using humic acid or surfaces as surrogates for biotic ligands; and

- 276 "generalized bioavailability models," which may be as simple as a single-variable regression such as
- pH against free metal ion toxicity (Table 2). Metal bioavailability models directly fitted to acute or
- chronic toxicity data such as those in Table 2 are often used to normalize single-species toxicity data
   to a target water chemistry prior to inputting such data into species-sensitivity distributions for
- 280 guideline development. The problem of relying on acute models to predict chronic effects is further
- explored in the Supplemental Data. Many recent models have also extended single-metal
- approaches to mixtures (Table 2).

283 Some themes become apparent from inspecting different models. All include chemical speciation 284 calculations, which require as inputs at least major ion chemistry (e.g., Ca, Mg, Na, K, Cl, SO4, and 285 alkalinity or dissolved inorganic carbon), DOC, pH, and temperature. For shorthand, we refer to 286 these as the "BLM" inputs. Some models, in addition, include Al and Fe. Thus, even the generalized 287 bioavailability models (gBAMs), which predict free metal ion toxicity as a function of pH and/or free 288 major cation activities, require the full BLM water chemistry to compute free ion activities. Further, 289 pH is consistently incorporated as an important toxicity-modifying factor, but the direction of 290 responses (i.e., whether an increase or a decrease in pH would increase or decrease the effect 291 concentrations of dissolved metal) often differ between plant and animal models (Figure 4). In 292 addition to affecting speciation, pH affects the bioavailability and toxicity of metals to plants by 293 changing membrane permeability (Boullemant et al. 2009; Lavoie et al. 2012). These are key reasons 294 why it will likely never be feasible to combine plant and animal bioavailability models into a single 295 model. The important but complex role of pH in bioavailability models is discussed in the section 296 Complexity versus simplicity: Use of mechanistic and hybrid models to inform development of simpler 297 models.

## 298 Alternatives to the conventional single-site unidentate BLM

299 When the BLM was first formulated (Di Toro et al. 2001), the biotic ligand was considered a single 300 unidentate binding site, for reasons of simplicity and lack of support for a more complicated 301 formulation. It was later shown that this formulation dictates a linear relationship between the 302 chemical activity of a competing cation and the x% effect concentration (ECx) of the toxic metal 303 expressed as free metal ion activity (i.e., ECx Me<sup>n+</sup>) and that stability constants of competitive 304 cations could be estimated directly from a linear regression (De Schamphelaere and Janssen 2002). 305 This prompted an explosion of studies (both acute and chronic) that estimated log KBL values for 306 various organisms and metals directly from toxicity data, using univariate test designs.

307 However, observed relationships often deviated from perfect linearity. Various potential mechanistic 308 hypotheses have been put forward to explain these deviations, including binding of metal species 309 (e.g., MeOH<sup>+</sup>, MeCO<sub>3</sub>) other than the free metal ion (De Schamphelaere et al. 2004), differences 310 between pH in bulk solutions and the organism microenvironment (Playle and Wood 1989), multiple 311 biotic ligand sites relating to multiple uptake sites or multiple simultaneous mechanisms of toxicity 312 (Peters et al. 2011), bidentate biotic ligand sites (Farley and Meyer 2015), and the influence of 313 plasma membrane potential on free metal ion activity at the biotic ligand (Kinraide 2006). In quite a 314 few cases, researchers (including some authors of the present study) have generated models 315 providing good fits and predictive capacities but at the expense of unrealistic parameter estimates 316 (e.g., assuming that MeOH<sup>+</sup> species are almost equally as bioavailable as the free metal ion [De 317 Schamphelaere and Janssen 2004b; De Schamphelaere et al. 2004]).

It is always possible to perform a linear regression and derive classical log K values, often with still
 reasonably accurate representation of observed bioavailability relations. Yet, an increasing number

- 320 of observations have shown such strong deviations from linearity that alternative modeling
- 321 approaches have been pursued. Indeed, some of them have already been implemented in European
- 322 Union regulations, whereas others have not been implemented. Deviations from linearity appear to
- 323 be greatest for H<sup>+</sup> ions (i.e., pH), with some very obvious examples where log-linear relationships
- describe the observations much better than linear regressions (e.g., algae–Cu [De Schamphelaere
- and Janssen 2006]; Daphnia–Ni [Deleebeeck et al. 2008]; Daphnia–Cu [Van Regenmortel et al.
- 2015]). These observations have led to the formulation of "hybrid models," or gBAMs, that combine
   a log-linear pH effect (e.g., Figure 5) with the classic competition for other cations. Although this
- 328 practice can be perceived as less mechanistic than the classic unidentate single-site BLM, it should
- be emphasized that 1) the BLM is also just a fitted regression when the link between accumulation
- at a critical site and toxicity is not made (e.g., Figure 3) and 2) various alternative mechanisms may
- 331 lead to log-linear pH effects on free metal ion toxicity (e.g., Figure 3).
- 332 The overall message of Figure 3 is that different mechanistic theories and model formulations can
- 333 generate either approximately linear or log-linear relations. In addition, assuming, for instance, a
- bidentate binding model, the pKa values can generate a wide range of pH–ECx Me<sup>n+</sup> slopes (on a log
- scale) In the absence of mechanistic evidence, such relationships are equivalent to MLRs.
- 336 Nevertheless, hybrid models which incorporate such regressions into a BLM framework are useful
- 337 for regulatory purposes, as long as they accurately predict toxicity over a wide range of conditions.
- A consequence of approaching the BLM as just equations to be solved by using optimization routines to find the best values for unknown parameters is that the fitted solutions may be disconnected from the BLMs' mechanistic foundations. Prominently, a fundamental BLM tenet is that toxicity follows accumulation on the biotic ligand (Table 1). In model construction, if the speciation model and log K values used successfully reproduce measured accumulation values, then the model is grounded in reality. However, if this step is bypassed, such as when appropriate accumulation data are not available, it is possible to successfully fit BLMs to toxicity values using binding constants or
- 345 LA50 values that appear to be chemically or biologically unrealistic.
- 346 With Cu and Na, the apparent protective effect of Na<sup>+</sup> against Cu toxicity has been incorporated into 347 BLMs as a competition between Na<sup>+</sup> and Cu<sup>2+</sup> for binding to the biotic ligand. The binding constant 348 for Na<sup>+</sup> that can be extracted from toxicity experiments tends to produce log K (biotic ligand–Na) 349 values of 2.5 to 3.5 in various BLMs. This agrees well with the common observation that the binding 350 affinity ( $K_m$ ) values for unidirectional active Na<sup>+</sup> uptake values in most freshwater organisms are in 351 the range of 10-3 M. It is curious therefore that, in contrast, log K (organic acid–Na) stability 352 constants for various organic acids and Na are mostly between 0.7 and 1.9 (Stumm and Morgan 353 1996). This illustrates that organismal biology is more complicated than simple chemistry. Figure 5 354 illustrates a further example, comparing measured and predicted Cd LC50s with rainbow trout from 355 diverse studies using 2 BLM constructs. In Figure 5, model A, the log K Cd-biotic ligand binding affinity coefficient of 8.1 is similar to those derived from gill accumulation experiments (e.g., 8.6 356 357 [Playle et al. 1993a]; 8.0 [Niyogi et al. 2008]). Yet in Figure 5, model B, even when the Cd-biotic 358 ligand binding affinity is decreased 2 full orders of magnitude (2 log units), the fit of the toxicity data 359 is just as good, so long as the LA50 is reciprocally lowered 2 orders of magnitude to 0.03% (see 360 online Supplemental Data SI-2 in Farley et al. 2015). However, fit aside, both of these LA50 values 361 are lower than experimentally determined values, and an LA50 of 0.03% seems implausible, 362 assuming that binding to the site of toxic action is proportional to binding sites on the gill. An LA50 363 of 0.03% implies that Ca regulation would be fatally compromised with channels that are 99.97% 364 intact, which does not seem physiologically plausible. For comparison, experimentally derived LA50

- values for Cd in rainbow trout studies have been approximately 10 to 30% of the strong binding siteson the gill (Birceanu et al. 2008; Niyogi et al. 2008).
- The reason for these modeling manipulations was to try to find a combination of parameters that would mimic tests that showed that Cd toxicity was reduced by adding Cu, implying that Cu may have a higher affinity than Cd to the biotic ligand. Although ungrounded from accumulation, such manipulations have shown practical success across complex and varied exposure conditions (Farley
- et al. 2015). The capacity of the BLM structure to use widely available toxicity data to predict
- 372 responses over a wide combination of waters, metals, and organisms is a major strength of the
- approach. However, too much flexibility from many adjustable parameters can lead to
- 374 unconstrained models that would more accurately be described as "mechanistically inspired"
- 375 models, rather than "mechanistic" models.
- 376 Complexity versus simplicity: Use of mechanistic and hybrid models to inform development of simpler377 models

378 The broad influence of metal bioavailability models within science communities has not always 379 translated to their broad adoption by regulatory authorities (e.g., Wood et al. 2012a, 2012b). The 380 necessity of determining the full composition of each water sample and the complexity underlying 381 bioavailability-based models has proven to be a limitation for their wide application. To broaden 382 access to potential users, various functional interfaces and simplified versions have been developed. 383 In the early 2000s, Robert Santore and colleagues developed and freely shared an intuitive, spreadsheet-style software interface that executed the BLM structure developed by Di Toro et al. 384 385 (2001) and Santore et al. (2001). The software provided users a flexible platform to explore toxicity 386 data and water chemistry and to expand on the work of the developers with new models. The 387 influence and utility of this modeling platform are evidenced by approximately 300 literature 388 citations to the software to date and by its incorporation into the US Environmental Protection 389 Agency's national recommended aquatic life criteria for copper (US Environmental Protection 390 Agency 2007). At the time of writing, the software was on its fourth major version. In the European 391 Union, environmental quality standards under the Water Framework Directive and risk assessments 392 under the policy Registration, Evaluation, Authorisation and Restriction of Chemicals employ 393 computationally intensive applications of multiple BLMs developed to protect algae/plants, 394 invertebrates, and fish (see Nys et al. (2016) for Ni; Van Regenmortel et al. (2017) for Cu and Zn; and 395 Van Sprang et al. (2016) for Pb). Various simplified proxies have been developed including Bio-Met, 396 which employs look-up tables that approximate BLM calculations for Cu, Ni, Zn, or Pb with over 20 397 000 values covering a wide range of environmentally relevant water chemistries, using fewer 398 parameters (Ca, pH, and DOC) than the full BLMs. Similar algorithm-based approaches that simplify 399 inputs and user calculations include the Metals Bioavailability Tool and PNEC-Pro (Peters et al. 2016; 400 Verschoor et al. 2017). For Pb, a separate tool simplifying speciation and toxicity predictions is also 401 available (Van Sprang et al. 2016). All these resources can readily be found through internet 402 searches.

403 Because mechanistic and hybrid models typically integrate the effects of water chemistry on 404 geochemical speciation as well as interactions of toxic metal species (mostly Me<sup>n+</sup>) with the 405 organism, obvious roles of these models are to populate look-up tables and to inform the 406 development of MLRs (Brix et al. 2017a; DeForest et al. 2018). For example, a statistical approach to 407 developing MLRs using stepwise automated routines to maximize partial regression coefficients may 408 yield a good fit between effects and predictor variables. Yet, variables that are only important in a 409 subset of the data or that have subtle effects may be missed, and a statistical approach alone cannot 410 distinguish between causative and correlative variables. In the case of MLRs for Cu and AI, the choice of potential toxicity predictor variables (DOC, pH, and water hardness or Ca) was informed by
associated BLMs (e.g., Santore et al. 2001, 2018), not by statistical explorations.

413 To further illustrate how mechanistic bioavailability models can inform simpler approaches, we have 414 used a chronic gBAM for fish (De Schamphelaere 2018) to predict how the 30-d LC20(dissolved) of 415 Cu in soft water (hardness ~10 mg/L) for fish varies as a function of the DOC, species sensitivity, and 416 pH (Figure 6). This gBAM accounts for geochemical speciation effects, competition of Cu<sup>2+</sup> with Ca<sup>2+</sup> and  $Mg^{2+}$ , and effects of pH on  $Cu^{2+}$  ion toxicity. The simulations provide relationships between ECx 417 418 and DOC that "emerge" from the joint effects of these 3 processes in the hybrid gBAM model. These 419 simulations illustrate 3 important points: 1) the relation between ECx and DOC is nearly perfectly 420 linear, on both linear and logarithmic scales; 2) on a linear scale, the slope of the ECx versus DOC 421 relation is higher for less sensitive organisms and at higher pH; and 3) on a logarithmic scale, slopes 422 appear nearly independent of species sensitivity or pH. This indicates that an MLR on a linear scale 423 should contain not only a linear DOC term but also an interaction term between pH and DOC and 424 furthermore that an MLR slope derived on the basis of an insensitive species should not be 425 extrapolated to a more sensitive species. Similar simulations can be performed for other species,

426 water quality variables, and metals, resulting in specific recommendations for MLR construction.

#### 427 Equilibrium issues

- 428 From both chemical and biological perspectives, BLMs and related constructs all assume equilibrium
- 429 conditions. If this is not the case, the predictive abilities of the model may be compromised.
- 430 Instances where equilibrium may not occur include laboratory exposures with incompletely
- 431 equilibrated diet and/or DOC and environmental exposures such as pulse exposures from
- 432 stormwater or meltwater runoff (Kayhanian et al. 2008; Nimick et al. 2011; Balistrieri et al. 2012;
- 433 Figure 7) and exposures within mixing zones downstream of point-source releases (Vandenberg et
- al. 2005). Nonequilibrium conditions can cause metals which equilibrium-based speciation
- 435 calculations assign to complexes to actually be bioavailable, whereas equilibrium models such as
- 436 BLMs generally assume that complexed metals are not bioavailable (Zhao et al. 2016).
- 437 Reactions of metal ions with dissolved inorganic ligands typically reach equilibrium in seconds to 438 minutes. However, equilibration of metals with DOC can take hours to days. This issue was initially 439 manifested in fathead minnow Cu toxicity data reported by Erickson et al. (1996). In nonrenewal 440 static trials, the 96-h test duration was sufficient for any disequilibrium associated with Cu–DOC 441 complexation to be effectively eliminated during the early part of the exposure. However, in flow-442 through tests, a Cu stock solution was mixed with unamended Lake Superior water in the diluter 443 head tank just prior to entering the 45-min residence time test chamber. In this case free Cu was 444 continuously elevated relative to equilibrium conditions, and toxicity was increased relative to static 445 tests at the same dissolved Cu concentration. Model-predicted LC50s were almost identical in the 2 446 flow regimes, but in the flow-through tests, they were consistently higher than observed values (i.e., 447 toxicity was underestimated by the model), whereas in the static tests they were consistently lower 448 than observed values (i.e., toxicity was overestimated), under otherwise similar conditions (Figure 449 8A,B; Santore et al. 2001). This interpretation is consistent with tests that found that Ceriodaphnia 450 dubia Cu LC50s were directly related to equilibration time with DOC (Kim et al. 1999; Ma et al. 1999). 451 A caution, however, is that DOC tends to increase over time during static tests, as a result of 452 accretion of organic carbon from the test organisms. For Ag and Cu, metals with strong affinities for DOC, small increases in DOC in the range of 0.2 to 0.5 mg/L can produce noticeable changes in 453 454 modeled or measured toxicity (Erickson et al. 1998; Welsh et al. 2008). Thus, the pattern of greater 455 toxicity of Cu in flow-through tests than static tests could be influenced by both incomplete 456 equilibration in the former and increasing DOC over the course of the latter tests.

457 At high humic acid (>5 mg/L DOC) and Cu (>1  $\mu$ M) concentrations, up to 30 h were required to reach 458 equilibrium (Ma et al. 1999). Under more dilute conditions with DOC <1 mg/L, Cu more rapidly 459 equilibrated in 0.1 to 4 h (Louis et al. 2009; Meyer and Adams 2010). As an example, the kinetic data 460 of Ma et al. (1999) were used to calculate that at the start of a static exposure the free Cu ( $Cu^{2+}$ ) 461 concentrations might be elevated as much as 10-fold relative to the concentration at equilibrium 462 (Figure 9A). After the first 24 h, the deviation from equilibrium is small; and after 30 h, equilibrium is 463 achieved (Figure 9B). Similarly, in static-renewal tests, the solution is refreshed at regular intervals, 464 resulting in elevated free Cu with each renewal unless pre-equilibration is used (Figure 9C). Most 465 seriously, in flow-through tests with a short hydraulic residence, free Cu will be elevated throughout 466 the test (Figure 9D). Similarly, Meyer and DeForest (2018) invoked the Ma et al. (1999) kinetic model 467 to argue that a lack of adequate equilibration could explain the apparently very low threshold effect 468 concentrations (<2 µg Cu/L) reported by Dew et al. (2012) for olfactory impairment in fathead 469 minnows exposed to Cu for short durations (1–24 h), as an alternative to the damage-repair 470 hypothesis proposed by Dew et al. (2012) for explaining the decrease of olfactory impairment as 471 exposure time increased.

Reports on the importance of pre-equilibration as a factor modifying metal toxicity have been
inconsistent. For instance, although Glover et al. (2005) found that Ag was more toxic to Daphnia
magna (lower 24-h LC50s) in tests initiated after 3-h metal–DOM contact time than in tests initiated
after 24 h contact time (Figure 10), Erickson et al. (1998) found little effect on Ag toxicity from aging
solutions for 72 h before testing. Further, in contrast to the Ma et al. (1999) results, Wang et al.
(2011) found little differences in Cu toxicity between tests initiated with freshly mixed exposures
versus solutions that had been aged for 24 h.

479 Equilibrium models are a reasonable simplification of real-world systems in many cases, such that 480 simple relationships have been obtained that relate metal speciation to biological effects (e.g., the 481 present review; Zhao et al. 2016). This simplification is probably necessary when using bioavailability 482 models, whether mechanistic or empirical, to inform regulatory applications. Nevertheless, the 483 controversies over equilibrium assumptions and contrasting results preclude conclusive 484 generalizations to resolve the apparent equilibration dilemma. Still, unless time-varying conditions 485 are the focus of testing, we suggest a 24-h pre-equilibration period in experimental designs to allay 486 concerns of nonequilibrium.

487 Toxicity test design considerations for developing mechanistic and hybrid bioavailability models

Historically, mechanistic and hybrid metal bioavailability models have been developed from 1)
multiple univariate toxicity experiments, where each factor (e.g., Ca, Na, DOC, pH) is varied alone; 2)
full-factorial test designs (which can be considered a series of univariate experiments at various
conditions); 3) multivariate toxicity experiments, where factors are varied in various combinations;
or 4) a combination of 1) and 2). Regardless of the design, well-informed selection of the water
chemistry variables is crucial. This selection should be based on prior knowledge of suspected
influential variables, using information on other organisms, other metals, previous metal uptake and

- 495 toxicity data, and physiological understanding.
- 496 Multivariate experiments are particularly useful as a first step to discriminate the more from the less
- important toxicity-modifying variables. However, on their own, they are not necessarily the most
- 498 useful for mechanistic model development, as illustrated in the following example. De
- 499 Schamphelaere and Janssen (2004b) performed chronic D. magna toxicity experiments with Cu in a
- 500 multivariate design with pH, DOC, and hardness as the factors. They found that DOC and pH were
- significant factors but that hardness was not. They subsequently used the data to calibrate a chronic

Cu-BLM for Daphnia, in which Ca or Mg competition was not included. Also, Na was included in the
 model because of evidence from a parallel univariate experiment with Na that showed a correlation
 with Cu toxicity. Later, Rodriguez et al. (2012) performed univariate experiments and did find
 protective effects of Ca and Mg. Van Regenmortel et al. (2015) developed an optimized chronic Cu
 bioavailability model by reformulating it as a gBAM and including biotic ligand constants for Ca and
 Mg. This optimized model accurately predicted the toxicity observed in both data sets.

508 This example indicates that non-full-factorial multivariate test designs can "miss" toxicologically 509 significant modifying factors, especially when the design is run over multiple test series where 510 between-batch variability may play a role (see Supplemental Data). On the positive side, the 511 example illustrates that, over time, existing models can be improved if new data become available 512 and that data sets from different sources can be used jointly for model calibration. It also suggests 513 that univariate test designs are best for calibration of individual model parameters (e.g., biotic ligand 514 stability constants for competing cations in BLMs or pH slopes in gBAMs). Furthermore, the 515 mathematical method to estimate log K values is well known and relatively straightforward (De 516 Schamphelaere et al. 2002). Full-factorial designs (the special case of multiple univariate 517 experiments) have been rarely used in generating bioavailability models because they are the most 518 costly and labor-intensive, but they are particularly useful to detect interactive effects. Using this 519 design, Deleebeeck et al. (2009) were able to show no interactions between pH and Mg on chronic 520 Ni toxicity to algae, allowing them to formulate a model that was successful at predicting Ni toxicity 521 in a range of spiked field waters. In summary, all sorts of designs can help in initial model 522 development, but univariate or full-factorial designs are the best for calibration of individual model

523 parameters.

#### 524 Consideration of other toxicity-modifying factors

Although pH, DOC, and major ions have been incorporated into most bioavailability models (Table 2), other factors have received much less attention by bioavailability model developers. We are not aware of any current regulatory framework that explicitly incorporates effects of other metal toxicity factors such as acclimation to prior metal exposure, temperature, nutrients, suspended solids, or iron hydroxides in the assessment of metal toxicity. Yet we now know that such factors may strongly affect metal toxicity, and in the case of nutrients and temperature, for example, a wealth of empirical data is available.

532 Acclimation to chronic metal exposures can have major effects on responses to subsequent acute 533 exposures, through acquired tolerance. During long-term, low-level exposures, gill metal burdens 534 may increase above the concentrations usually associated with acute toxicity (reviewed by Niyogi 535 and Wood 2003). This has been explained by the "damage-repair hypothesis," whereby the repair 536 processes increase the tolerance of the organism to a particular metal burden (McDonald and Wood 537 1993). Likewise, the log K and Bmax conditional binding constants of the metal biotic ligand and of 538 the various cation-biotic ligand complexes will be markedly changed following acquired tolerance, 539 yet these constants are considered to be unchangeable with the changes in environmental 540 conditions in BLMs (Niyogi and Wood 2003). Although acquired tolerance from exposure to elevated 541 metals has long been recognized (Chapman 1985), acclimation to soft or hard water, or differences 542 in the composition of the diet (e.g., high calcium or sodium content) may also have profound effects 543 on metal tolerance and modeling (e.g., Niyogi and Wood 2003; Franklin et al. 2005; Todd et al. 2009; 544 Mebane et al. 2010). In criteria development, acclimation is considered a confounding, false 545 protection to be guarded against because acquired protections may not be persistent and, 546 furthermore, the energetic costs of tolerance may lead to other adverse effects (Stephan et al. 1985; 547 Brinkman and Woodling 2014). However, the implications of variations in binding constants

- 548 depending on earlier metal exposure, water hardness, diet, and other environmental or
- 549 physiological conditions seem to be underrecognized in the development and application of metal 550 bioavailability models (Niyogi and Wood 2003).

551 Most studies on temperature effects have investigated acute toxicity. These have reported both 552 increasing metal toxicity with increasing temperature (Rao and Khan 2000; Heugens et al. 2003) and 553 increasing toxicity with decreasing temperature (Hodson and Sprague 1975; Hansen et al. 2002). 554 Much more limited data are available on chronic metal toxicity, but a recent study showed that 555 chronic metal toxicity to D. magna varied by approximately 2-fold, with a clear pattern of higher 556 toxicity at lower temperature, opposite to what is most commonly expected for acute toxicity 557 (Pereira et al. 2017). Interestingly, for Cu, the response pattern could be explained by the computed 558 effect of temperature on speciation but not for Ni and Zn. Until now, most BLMs and hybrid models 559 do include temperature as an input parameter, but they only compute the effect of temperature on 560 inorganic speciation, whereas DOC interactions, which rely on WHAM V, VI, or VII, are not 561 temperature-adjusted. Most importantly, any temperature effects at the biological receptor are not incorporated. More empirical and mechanistic research is clearly needed to better integrate 562

temperature into bioavailability models and AWQC.

564 Effects of nutrient concentrations, especially phosphate, on metal toxicity have been studied

- 565 extensively and can be relatively strong but are inconsistent across various studies. Notably,
- 566 phosphate concentrations in natural freshwaters (European annual mean in rivers as of 2012 was
- 567 65 μg PO4-P L–1 [European Environment Agency 2018]) are typically considerably lower than those
- 568 applied in standard algae toxicity test protocols (310–1550 μg PO4-P L–1 [Organisation for Economic
- 569 Co-operation and Development 2011; US Environmental Protection Agency 2002]). Thus, a better 570 mechanistic understanding of nutrient effects on metal toxicity, and associated incorporation into
- 571 models, is urgently needed to improve laboratory-to-field extrapolation. Gao et al. (2016), for
- 572 example, developed a mechanistic dynamic model that integrated effects of external phosphate,
- algal cell P content, and Zn on instantaneous algal growth rate. Their model was able to explain why
- 574 different exposure scenarios (duration, phosphate supply, and initial P content of algae) can lead to
- 575 opposite apparent effects of phosphate on Zn-induced declines of algal biomass in standard toxicity
- tests. As bioavailability modeling expands into metalloids and plants, we expect nutrients will havean important role as a modifying factor, especially with pairs such as phosphate and arsenate (Zhao
- 578 et al. 2016).
- 579 The role of organic ligands that bind metals and form lipophilic complexes has received little
- 580 attention in metal bioavailability modeling. Similarly, the potential role of low-molecular weight
- 581 metabolites such as thiosulfate or citrate (which can bind metals and then transport them across
- 582 epithelial surfaces as the intact metal–ligand complex via anion transporters) has received little
- attention (Zhao et al. 2016). Although BLMs and related constructs usually treat complexed metals
- as nontoxic, attributing toxicity only to the free ion metals, we now know that complexed metals can
- 585 be bioavailable and toxic under some circumstances (Erickson et al. 1996; Zhao et al. 2016).
- 586 Other trace metals, such as Fe and Al, may also influence metal toxicity, notably via 1) competition
- 587 with the toxic metal ion for binding on DOC, and 2) by providing an adsorption phase when in the
- 588 colloidal hydroxide-precipitated form (Cain et al. 2016). It would be worthwhile to explore how
- 589 effects of these and other bioavailability-modifying factors could be added to metal bioavailability 590 models.
- 591 The choice of speciation modeling platforms for BLMs

592 Given the importance of DOM (natural organic matter, DOC) in metal speciation, the speciation 593 modeling component of a mechanistic bioavailability model must be capable of accurately predicting 594 metal–DOM complexation. Several mechanistic models exist for computing metal binding to humic 595 and fulvic acid, which are the dominant components of DOM in freshwaters. These include the 596 humic ion-binding family (Models V, VI, and VII; Tipping and Hurley 1992; Tipping 1998; Tipping et 597 al. 2011), the nonideal competitive absorption (NICA)-Donnan model (Kinniburgh et al. 1996) and 598 the Stockholm humic model (Gustafsson 2001). These are combined with inorganic speciation codes 599 in tools such as WHAM, Visual MINTEQ, and the Hydroqual/Windward BLM software. These 600 inorganic speciation models differ somewhat in the binding affinity values used and even the 601 presence of equilibrium constants in their code. Some speciation models do not account for 602 precipitation/dissolution reactions. The absence of the relevant equilibrium constants can lead to 603 the use of unstable metal exposure regimes in experiments, where the metal's solubility limit is 604 exceeded.

605 A number of speciation models have been used in BLM development. Di Toro et al. (2001) 606 implemented WHAM V within the CHESS framework, and many subsequent studies (e.g., De 607 Schamphelaere and Janssen 2002; Heijerick et al. 2005) also used WHAM V. Others have used 608 WHAM VI (e.g., Deleebeeck et al. 2008; Peters et al. 2011), WHAM VII (Vukov et al. 2016), or NICA-609 Donnan (Van Sprang et al. 2016). The choice of speciation model platform may be informed by a 610 number of factors, particularly the availability of binding constants for the metal of interest. Derived 611 BLM binding constants (i.e., log K values) are conditional on the choice of speciation model, and 612 different BLM binding constants can be obtained from the same data set using different speciation 613 models. This has implications for metal-mixture BLMs—here, a single speciation model should be used for all metals to account for intermetal competition on DOM binding sites, and the provenance 614 615 of any binding constants used should be carefully evaluated. We did not reach consensus whether 616 any single speciation model for either DOM binding or inorganic speciation could be considered 617 optimal. The choice of models may be informed by a number of factors, particularly the availability 618 of binding constants for the metal of interest.

#### 619 Specification of DOM (DOC) in models

620 All of the DOM-binding models listed require concentrations of humic and/or fulvic acid to be 621 specified. This requires the use of "activity factors"—the ratio of measured DOC concentration to 622 the concentrations of humic and/or fulvic acid that reproduce the metal-binding properties of that 623 DOC. The activity factor is composed of 3 components, each of which may be assumed or estimated: 624 the carbon content of DOM, the metal-binding properties of that DOM, and the attribution of the 625 binding properties of that DOM to humic and/or fulvic acid. Development of a BLM has usually used 626 a global activity factor, sometimes derived from metal-DOM binding studies (Dwane and Tipping 627 1998; Bryan et al. 2002). Early developments (e.g., Di Toro et al. 2001) assumed DOM to be 50% 628 carbon, with 100% activity and comprising 10% humic and 90% fulvic acid. Because the activity 629 factor is in reality water-specific, some have researched whether the activity correlates to 630 measurable DOM properties. De Schamphelaere et al. (2004) found that optimizing water-specific 631 BLM predictions of acute Cu toxicity to D. magna produced activities (as fulvic acid only) that 632 correlated significantly with the specific absorbances of the DOM samples at 350 nm (SAC350). Al-633 Reasi et al. (2012) found significant correlations between acute Cu toxicity to D. magna and a 634 number of optical and physicochemical properties of DOM, with SAC340 being the most significant predictor of protective ability. They suggested that the predictive capability of BLMs could be 635 636 improved by the use of SAC340 to adjust the activity factor on a water-by-water basis. In general, 637 larger, more lipophilic, more aromatic DOMs of terrigenous origin, with higher humic acid-like

content, and therefore higher SAC values, appear to be more protective against Cu toxicity. Despite
these findings, however, many BLM studies still use a global activity factor in model development
because this has the advantage of requiring only measurement of absolute DOC concentration for
application.

642

#### 643 Evaluation of speciation models

644 The ability of models to predict metal speciation, for the chemical conditions relevant to BLM 645 development and application, needs to be fully evaluated. Because BLM parameterization employs 646 predicted free metal ion activity, testing should ideally be done on measurements of the free 647 activity. Speciation measurement is complex, and many methods remain under active development 648 rather than in routine use. Relatively well-established methods (e.g., ion-selective electrodes [ISEs]) 649 are challenging to apply at the dissolved metal and DOC concentrations encountered in natural 650 waters because of issues such as membrane dissolution and fouling (Eriksen et al. 1999), although 651 they can be highly useful in toxicity tests, particularly acute toxicity studies (e.g., Al-Reasi et al. 2012; 652 Crémazy et al. 2016). Some have used DOC preconcentration (Ahmed et al. 2013) or continuous-flow 653 (Tait et al. 2016) systems to enable measurement at the metal:DOM ratios encountered in natural 654 waters. Competitive ligand exchange voltammetry (Xue and Sigg 1999; Cao et al. 2006) has also been 655 used, though its validity has been criticized (van Leeuwen and Town 2005; Lofts and Tipping 2011). 656 Nonetheless, continued research in this area is essential, alongside critical assessment of speciation 657 models against such data. Of particular note is a pair of landmark studies comparing the reliability 658 and performance of different trace metal speciation analytical methods and comparative model 659 performance to modeling of metal speciation (Sigg et al. 2006; Unsworth et al. 2006). Examples of 660 model predictions compared against recent measurements using ISEs (for Cu) and an ion-exchange 661 technique (for Co, Ni, Zn, and Cd) are shown in Supplemental Data, Figures S1 through S6.

# 662 CONSIDERATIONS FOR THE INCORPORATION OF METAL BIOAVAILABILITY MODELS INTO

## 663 ENVIRONMENTAL QUALITY STANDARDS

#### 664 Dealing with extreme waters

665 The occurrence of extreme natural water conditions (e.g., unusual pH, hardness, DOC levels, or 666 combinations thereof) is a common reality for almost all geographical regions. These situations have 667 been recognized in working with BLMs (Van Genderen et al. 2005; Natale et al. 2007; Hoppe et al. 668 2015a, 2015b) and pose a common challenge in terms of bioavailability model development and 669 application for regulatory criteria. There are various reasons for this. First, the taxa typically used for 670 model development (i.e., organisms commonly used in all laboratory testing) may not be tolerant of 671 extreme water conditions. All of the water conditions that modify metal toxicity are themselves 672 environmental characteristics that limit habitat suitability in ways that have nothing to do with metal 673 toxicity. For example, DOM has been called an ecological driving force for aquatic ecosystems with 674 well-documented effects on the pH and primary productivity of natural waters (Steinberg et al. 675 2006). Furthermore, there is evidence that DOC can bind to the gills (Campbell et al. 1997) and alter 676 the basic physiology of ion transport in a way which can beneficially mitigate the damaging effects of 677 metals and low pH (Galvez et al. 2008; Wood et al. 2011; Duarte et al. 2016). These actions of DOC 678 are separate from their ability to reduce the bioavailability of metals by complexation. Some 679 crustaceans and snails will not thrive in culture waters of very low hardness or pH (i.e., control 680 performance will not be acceptable). Equally, they will not be present in natural waters of low 681 hardness (Lodge et al. 1987; Hooper et al. 2008; Cairns and Yan 2009). Second, the available models

- are not generally validated for extreme water conditions, and thus, the predictions can be erroneous
- and/or generate uncertainty. And third, the extreme water types often have specific ecological
- assemblages with organisms of different physiological characteristics, which may or may not show
- 685 similar sensitivities and/or metal-bioavailability relationships (e.g., different log K values or pH
- 686 slopes) to organisms typically used for model development.
- The main target for model development should be the central distribution of data, such as the 5th to
  95th percentile of the distribution of water chemistry parameters, rather than undue focus on
- 689 exceptions and extreme values. The following options can be considered in deciding the derivation
- 690 of a new model or use of existing model for ecosystems with extreme water parameters.

## 691 Extending the boundaries of existing models

- 692 This includes recalibration of an existing bioavailability model with the testing of local waters and
- organisms to extend the physicochemical boundaries of the model. A series of papers has been
- 694 published with methods describing how the validation boundaries of BLMs or hybrid models for Cu,
- Ni, Zn, and Pb can be extended to also accurately predict metal toxicity under more extreme pH and
- hardness (Van Genderen et al. 2005; Deleebeeck et al. 2007; Nys et al. 2016, 2017; Van Regenmortel
- 697 et al. 2017).

## 698 Developing new bioavailability models

- 699 In general, bioavailability models should be developed and tested in media that resemble surface
- 700 water conditions that are within the natural limit of the test organism. Testing organisms outside
- 701 their usual physiological range of tolerance is inadvisable. Site-specific models should be developed
- vising toxicity testing that employs site waters and native organisms from the extreme sites.

## 703 Metal mixtures

- 704 Our discussions so far have treated metals as if they occur one by one in the environment. Likewise, 705 regulatory criteria are developed as if individual metals occurred in isolation, with no interactive
- toxicities. Both are, of course, complete fiction. In the real world, metals always occur in mixtures
- 707 that are a function of the mineral composition of the watershed. Anthropogenic inputs will
- 708 invariably produce mixtures of metals, and some generalities about mixture occurrences in ambient
- 709 waters can be made. The most predictable metal combination is probably Cd and Zn, which seem to
- naturally occur at close to a 1:200 mass ratio around the world (Mebane et al. 2017). Nickel and Co
- commonly occur in association with Cu, and Pb is commonly associated with Zn; but the ratios and
- particular combinations may be highly variable across geological domains (Salminen 2005). Empirical
- 713 models are not well suited to such variable scenarios, whereas mechanistic bioavailability and
- toxicity models do provide a flexible approach to handle these combinations.
- 715 It has long been recognized that the single-metal framework for BLMs could logically be extended to 716 metal mixtures (Di Toro et al. 2001; Playle 2004), and much recent progress has been made in this 717 area (e.g., Farley et al. 2015; Meyer et al. 2015; Nys et al. 2018). These metal mixture modeling tools 718 may be highly useful in risk-assessment scenarios. However, because of the overwhelming diversity 719 of possible combinations, we expect that regulatory criteria to protect aquatic environments will 720 continue to be developed for individual substances for the foreseeable future. Toxic unit models 721 assume that potency-normalized concentrations of metals can be added together to predict the 722 toxicity of a metal mixture; these provide a simple approach to estimate mixture toxicity risks from 723 single-metal toxicity models (concentration addition or toxic unit models). Alternatively, predicted 724 toxic responses from single-substance toxicity models can be added (response addition or, more

appropriately stated, independent action models). The concentration addition approach tends to be
 more conservative than the response addition approach; that is, concentration addition may predict

- 727 greater effects than observed (Van Regenmortel et al. 2017; Crémazy et al. 2018). Both approaches
- implicitly assume that chemicals in the mixture do not physically, chemically, or biologically interact
- and thereby overlook competition for metal binding sites on DOC and on the target biotic ligand,
- which could make metal mixtures more or less toxic than if there were no interactions. Recent
- studies at acutely toxic metal levels indicate that such binding interactions can occur at biotic ligands
  (Niyogi et al. 2015; Brix et al. 2016, 2017c). However, interactions between metals for biotic ligand
- or DOC binding sites are not predicted to be important at mixture concentrations at the low  $\mu g/L$
- relevant to most chronic regulatory criteria (Balistrieri and Mebane 2014). We believe that
- 735 mixture toxicity models are ultimately needed for the application of metal criteria, and as mentioned
- ration platform. However, the
- 737 development of bioavailability-based criteria on a single-metal basis remains a reasonable approach.
- 738 Concerns over how to apply criteria in the ubiquitous settings with metal mixtures present should
- not hold back the development and application of single-metal bioavailability-based criteria.

## 740 Ownership and maintenance of bioavailability models

741 Setting up the reaction equations for bioavailability models, writing code to execute them,

- 742 developing software to provide a functional user interface and interpretive output display,
- 743 documenting the construction and performance of the package, and preparing detailed
- documentation for users is no trivial undertaking. The expectations are particularly onerous when
- bioavailability models are used to set regulatory water criteria sufficient to protect diverse
- communities in diverse environments with legally enforceable limits that drive costs for engineering
- 747 design, capital construction, operating, and monitoring. Furthermore, the use of models in public
- 748 policy settings requires sustaining commitments by sponsors over the long term.

749 It takes no ongoing effort to maintain regulatory criteria that are expressed as simple mathematical 750 functions of toxicity-modifying factors. For instance, some of the criteria values based on hardness 751 equations published by the US Environmental Protection Agency (1986) are still in use 3 decades on. 752 In contrast, for criteria calculated with the aid of custom software, that software needs ongoing 753 maintenance to upgrade to new operating systems, to fix bugs, and to modify the model capabilities 754 following advances in the underlying science. These maintenance needs pose a challenge to 755 regulatory authorities. They must not just provide one-time support for a model to be used in 756 criteria and then move on; an ongoing commitment to maintain the model is needed. Further, the 757 opportunistic use of model software that is not fully in the public domain to set environmental 758 regulations raises intellectual property ownership questions. Institutions supporting chemical 759 speciation models may sell licenses to partially offset their development and maintenance costs and 760 allow the developers to keep advancing their models. Regulatory authorities may hesitate to rely on 761 a software application that is not in the public domain and that cannot be guaranteed to be 762 functional indefinitely, and they may be unwilling or unable to commit to ongoing support of model 763 applications on behalf of their affected dischargers. Until these practical model support and public domain issues are addressed, the pragmatic path forward is to use bioavailability models as research 764 765 tools to inform simpler, lower-maintenance translational tools for regulatory adoption, such as MLRs 766 and look-up tables (see section Complexity versus simplicity: Use of mechanistic and hybrid models 767 to inform development of simpler models).

768 CONSENSUS RECOMMENDATIONS FOR DEVELOPING OR APPLYING METAL BIOAVAILABILITY MODELS

- 769 Our workgroup reached consensus on the following points. It would be prudent for scientists and
- environmental managers to consider these when developing or applying metal bioavailability models
- 771 for environmental quality standards or risk assessment.
- 1) Empirical bioavailability tools such as MLRs and look-up tables should always be informedqualitatively and quantitatively by mechanistic models.
- 2) Going forward, equilibrium speciation should be considered in the design of experiments for
- bioavailability models. We recommend a 24-h pre-equilibration period in experimental designs to
- allay concerns of nonequilibrium test conditions. Care should be used to include speciation models
- that encompass precipitation reactions so as to ensure that the solubility limits are respected for the
- 778 metal(s) of interest and that no loss of solubility occurs.
- 3) The chemical speciation model used should be tested independently of its ability to predicttoxicity.
- 4) Data obtained from tests conducted with organisms outside the chemistry boundaries from
- 782 where they live should not be used. The main target for model development should be the central
- 783 distribution of data, such as the 5th to 95th percentile of the distribution of water chemistry
- parameters, rather than undue focus on exceptions and extreme values.
- 5) Some potentially important toxicity-modifying factors are currently not represented in
- bioavailability models and have received insufficient attention in toxicity testing. Temperature is
- 787 probably of foremost importance; P is likely important in plant and algae models.
- 6) Plant and animal bioavailability models should not be combined because of the divergentinfluences of pH.
- 790 7) pH is a unique toxicity-modifying factor, with multiple possible mechanisms. These effects are
- 791 currently best captured by hybrid models, which can inform improved mechanistic understanding
- and foster better mechanistic models of pH effects. Failures of mechanistic models to explain
- respective text and the second second
- 794 8) To develop models for mixture toxicity, a common chemical speciation platform should be used.795 This is particularly important for DOM.
- 9) To estimate bioavailability model parameters, univariate or full-factorial designs are most useful
  because multivariate designs may miss responses for variables with limited effect. In univariate test
  designs, nonsimultaneous testing can introduce confounding variability. In real laboratories in the
  real world, this may be unavoidable, but repeating treatments between studies is important.
- 10) For best practice during chronic tests, combined waterborne and dietary matched exposures
  should be performed. These should be based on natural live diets equilibrated with the associated
  waterborne metal concentration. However, the absence of such designs should not be a criterion for
  rejecting currently available chronic data.
- 11) There is a need to develop mechanistically based bioavailability models for behavioral toxicity
   and to consider these for future regulatory application. Such models should be built from the ground
- 806 up using behavioral endpoints, rather than by adjusting the sensitivity parameter in existing BLMs.
- 807
- 808 12)

- 809 If bioavailability models are to be used in environmental regulation, ongoing support and availability
- 810 for use of the models in the public domain are essential. Until this can be guaranteed, simpler,
- 811 lower-maintenance translational tools based on bioavailability models, such as MLRs and look-up
- tables, may be preferable.
- 813 Supplemental Data
- The Supplemental Data are available on the at DOI: 10.1002/etc.4560.
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Table 1. Summary of studies in which physiological mechanisms (e.g., gill enzyme inhibition or body ion loss) and/or the actual metal burden at the biotic
 ligand (e.g., gill metal concentration) have been measured

Metal	Organism	Physiological endpoints	Toxicity endpoints	Sources
Ag	Daphnia magna	1-h whole-body accumulation, gill enzyme inhibition	Mortality not measured	(Bianchini and Wood 2003)
Ag	Rainbow trout	2- to 3 h accumulations, gill enzyme inhibition	Accumulation and 96-h mortality data related across different studies	(Janes and Playle 1995; McGeer et al. 2000)
Ag	Rainbow trout	3- and 24-h gill accumulation	Mortality at 96 h	(Morgan and Wood 2004)
Al	Atlantic salmon	140-h accumulation	Mortality at 140 h	(Santore et al. 2018)
Cd	Rainbow trout	3-h gill accumulation	Mortality at 96 h	(Niyogi et al. 2008)
Cd, Cu	Fathead minnow	2- to 3-h gill accumulations	Mortality at 96 h	(Playle et al. 1993a, 1993b)
Cd, Cu, Pb, Zn	Rainbow trout	0.75- to 24-h gill accumulation	Accumulation and 96-h mortality data related across different studies	(Balistrieri and Mebane 2014)
Cd, Pb	Rainbow trout	3- and 24-h gill accumulation; Ca <sup>2+</sup> and Na <sup>+</sup> influx	Mortality at 96 h	(Birceanu et al. 2008)
Cu	Rainbow trout	24-h gill accumulations	Mortality at 120 h	(MacRae et al. 1999)
Cu	Rainbow trout	24-h gill accumulations	Mortality at 96 h and 30 d	(Ng et al. 2010)
Cu	Rainbow trout	24-h gill accumulations from previous work	Mortality at 96 h and 30 d	(Crémazy et al. 2017)
Ni, Cu	Fathead minnow	2- to 3-h gill accumulation	Mortality at 96 h	(Meyer et al. 1999)
Pb	Rainbow trout	3-h gill accumulation	Time to mortality of a single concentration in different waters	(Macdonald et al. 2002)
Pb	Rainbow trout	0- to 96-h Pb accumulation, enzyme inhibition, ion flux rates	Mortality not measured	(Rogers et al. 2005; Rogers and Wood 2004)
Zn	Rainbow trout	0.5- to 72-h gill accumulations	Mortality at 96 h	(Alsop and Wood 2000)
Zn	Rainbow trout	0.75- and 3-h gill accumulations	Mortality at 96 h	(Todd et al. 2009)

1339 Tab	e 2. Selected exam	ples of available	freshwater bioav	ailability-based	modes of metal toxicity
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Metal	Model type or name	Reference	Organisms used in development	Organisms presumed applicable to	Necessary inputs	Example applications	Notes
AI	Acute and chronic BLM	(Santore et al. 2018)	Various fish, invertebrates and green algae	All freshwater aquatic life	"BLM"	Model supported a simplified MLR model which became federal water quality guidance for United States (US Environmental Protection Agency 2017)	Toxicity is considered a function of both dissolved and precipitated Al, caused by either ionoregulatory or respiratory disturbance depending on pH
Cd	Acute BLM	(Niyogi et al. 2008)	Rainbow trout		"BLM"		Classic BLM with binding coefficients derived from measured gill accumulation
Cd	Acute BLM	(Clifford and McGeer 2010)	Daphnia pulex		BLM		Binding coefficients calculated from toxicity values from a wide variety of water types
Cu	Acute BLM	(Di Toro et al. 2001; Santore et al. 2001; US Environmental Protection Agency 2007)	Fish, Daphnia	All freshwater animals	"BLM"	Acute model extrapolated to chronic criterion by ACR; adopted as federal water quality guidance in United States;	Me-BL log K values from fish gill accumulation tests, toxicity data used to adjust CA values for Daphnia and others

						some adoption	
						by states	
Cu	Generalized	(De	Green algae	All primary	pH ("BLM"	ERA for REACH,	pH only factor
	bioavailability	Schamphelaere		producers	set needed	EQS (Europe)	affecting algal
	model (gBAM)	et al. 2003;			for FIA		growth when
		Van Sprang et			calculation)		expressed as FIA;
		al. 2008)					full "BLM" chemistry
							needed for FIA
Cu	Chronic BLM	(De	Daphnia	All invertebrates	"BLM"	ERA for REACH,	Only H and Na
		Schamphelaere	magna			EQS (Europe)	considered to
		and Janssen					compete with Cu;
		2004a)					CuOH <sup>+</sup> and CuCO <sub>3</sub>
							also bind to BL and
							significantly
							contribute to
							toxicity
Cu	Chronic gBAM	(Van	Daphnia	All invertebrates	"BLM"		Toxicity of FIA
		Regenmortel	magna				predicted as a
		et al. 2015)					function of pH, Na,
							Ca, Mg
Cu	Chronic BLM	(Crémazy et al.	Rainbow	Fish	"BLM"		Toxicity decreased
		2017)	trout				(higher effect
							concentrations) with
							increasing pH, but
							pattern reversed at
							high pH (>8); even in
							long-term
							exposures, Cu was
							an acute toxicant
Ni	Hybrid BLM	(Deleebeeck et	Rainbow	Fish	"BLM"		Nonlinear pH
		al. 2007)	trout,				response could not
			fathead				be modeled as a
			minnow				single-site BLM;

							model predicted
							toxicity well, but the
							exact mechanisms
							by which Ca, Mg,
							and pH modify Ni
							toxicity were
							undetermined
Ni	Hybrid BLM	(Deleebeeck et	Daphnia	All invertebrates	"BLM"		Stronger effect of
		al. 2008)	magna				pH on chronic
							toxicity than acute;
							similar issues and
							resolution with
							nonlinear pH
							response as their
							fish model
Ni	Hybrid BLM	(Deleebeeck et	Green algae	All primary	"BLM"		Predictions from
		al. 2009)		producers			classic BLM limited
							to a narrow pH
							range; incorporating
							a nonlinear pH
							function expanded
							prediction ranges
Ni	Chronic BLMs	(Schlekat et al.	Fish,	All freshwater	"BLM"	ERA for REACH,	Tested existing
		2010)	daphnids,	aquatic life		EQS (Europe)	BLMs; BLMs
			duckweed,				developed with
			snails,				cladocerans
			rotifers,				outperformed BLMs
			insects,				developed for more
			Chironomus				taxonomically
			dilutus				similar taxa
Pb	Chronic BLM	(Nys et al.	Ceriodaphnia	Freshwater	"BLM"	ERA for REACH,	pH had a strong
		2014)	dubia	invertebrates		EQS (Europe)	influence on toxicity
							but not Ca; H⁺ (as

							$\log K_{BL-H}$ ) was the
							only competitive
							constant needed
Pb	gBAM	(Van Sprang et	Algae and	All aquatic	"BLM"	ERA for REACH,	Toxicity of FIA for
		al. 2016)	fish	organisms		EQS (Europe)	algae is a function of
							pH and DOC only;
							for Ceriodaphnia,
							pH; and for fish, pH
							and Ca
Pb	Acute and	(DeForest et al.	Daphnids,	All aquatic animals	"BLM"		Various animal
	chronic BLMs	2017)	mayflies,				toxicity data sets
			fathead				were fit by adjusting
			minnow,				critical accumulation
			rotifer, snails				values with a single
							set of unidentate log
							K values; includes
							PbOH <sup>+</sup> toxicity
Zn	Chronic BLM	(Heijerick et al.	Daphnia	Daphnia magna	"BLM"	RA for REACH,	Toxicity of FIA
		2005)	magna			EQS (Europe)	increased (lower
							effect
							concentrations) with
							increasing pH
Zn	gBAM	(De	Green algae	All primary	pH ("BLM"	RA for REACH,	Toxicity of FIA and
		Schamphelaere		producers	set needed	EQS (Europe)	dissolved Zn
		et al. 2005a)			for FIA		increased (higher
					calculation)		effect
							concentrations) with
							increasing pH; pH
							was the only factor
							affecting Zn
							suppression of algal
							growth when
							expressed as FIA;

							full "BLM" chemistry
							needed for FIA
Zn	Chronic BLM	(De	Daphnia	All invertebrates and	"BLM"	ERA for REACH,	Similar model
		Schamphelaere	<i>magna</i> and	fish		EQS (Europe)	structure and log K
		et al. 2005a)	rainbow				values between
			trout				Daphnia and trout
Zn	Acute BLM	(Clifford and	Daphnia		BLM		Binding coefficients
		McGeer 2009)	pulex				calculated from
							toxicity values from
							a wide variety of
							water types
Zn	Acute and	(DeForest and	Various	All aquatic animals	"BLM"	ERA for REACH,	Multiple BLM log K
	chronic BLMs	Van Genderen	aquatic			EQS (Europe)	values from
		2012)	animals and				previous models
			rotifers,				were averaged to
			Brachionus				produce a "unified
			calyciflorus				BLM which
							performed well
							predicting toxicity to
							a phylogenetically
							diverse group of
							species, including
							daphnids, rotifers,
							snails, and fish"
Al, Cu,	"F-Tox" humic	(Stockdale et	Field surveys	Macroinvertebrate	"BLM"		Humic acid used as
Pb, Zn	acid model	al. 2010)	of stream	communities			proxy for
			aquatic				bioaccumulation on
			insect				insect biotic ligands;
			communities				fitted potency
							factors were used to
							relate modeled
							accumulation of

						metals to species richness
24 metals	"F-Tox" humic acid model	(Tipping and Lofts 2013, 2014; Tipping et al. 2019)	Fish, cladocerans, lettuce	Various aquatic species	"BLM"	richness F-Tox humic acid model expanded to predict effects in classic single-species toxicity tests; fitted potency factors were used to relate modeled accumulation of
						metals to various endpoints
Al, Cd, Cu, Ni, Pb, Zn	"Tox" (generalization of the F-Tox humic acid model)	(Balistrieri and Mebane 2014; Balistrieri et al. 2015; Mebane et al. 2017)	Trout in single- species toxicity tests; stream and lake aquatic invertebrate communities	Natural aquatic communities	"BLM"	Similar to F-Tox but generalized to use various bioaccumulation models, including but not limited to humic acid
Cd, Cu, Zn	2-pKa bidentate model with Tox addition	(Farley and Meyer 2015; Mebane et al. 2017)	Trout, cladocerans, stream insect communities	Freshwater animals	"BLM"	"Streamlined" mixture models used bidentate, single-site accumulation models with Tox addition to predict effects; bidendate structure increased flexibility for handling nonlinear pH responses

Ag, Cd,	BLM and	(Veltman et al.	Various	Freshwater fish	"BLM"	The covalent index,
Cu, Zn	biodynamic	2010)	freshwater		chemistry;	reflecting metal
	hybrid model		fish		dietary and	affinity for proteins,
					gill uptake,	was used to
					assimilation,	estimate metal
					and	adsorption
					elimination	efficiencies
					rates;	
					organism	
					size	
Pb	Surface	(Antunes and	Duckweed	Vascular plants	"BLM"	Used the oxide
	complexation	Kreager 2014)	(Lemna			surface
			minor)			complexation model
						within WHAM VII
Cationic	Plasma	(Kinraide 2006)	Wheat	Vascular and single-	I "BLM set"	Most successful
metals	membrane		(Triticum	cell plants		when calculated
			aestivum)			with free ion
						activities. Concept is
						broadly applicable
						to aquatic organisms

1340 "BLM set" of model inputs are temperature, pH, dissolved organic carbon, Ca, Mg, Na, K, Cl–, SO4, and alkalinity or dissolved inorganic carbon.

1341 ACR = acute to chronic effects ratio; BLM = biotic ligand model; CA = critical accumulation values on the biotic ligand associated with a level of effect;

1342 EQS = environmental quality standard; ERA = environmental risk assessment; FIA = free ion activity; log K = stability constant for cations to biotic ligands;

1343 MLR = multiple linear regression; RA = response addition; REACH = Registration, Evaluation, Authorisation and Restriction of Chemicals; WHAM

1344 VII = Windermere humic aqueous model VII.

#### 1345 Figures

Figure 1. An example of a biotic ligand model calibrated to measure rainbow trout gill Ag
accumulation data, over a variety of water chemistry conditions. In most cases, the patterns of
measured and calculated accumulations matched well (redrawn from Janes and Playle 1995).

Figure 2. The biotic ligand model (BLM) used to predict gill accumulation in Figure 1 also predicts toxicity well. Median lethal concentrations of Ag experimentally obtained with *Ceriodaphnia dubia* from laboratory (open symbols) or natural (closed symbols) water exposures compare well with calculated BLM predictions. Solid diagonal is line of perfect agreement; dashed lines denote a factor of ±2 deviations from the 1:1 line. (Bielmyer et al. 2007; Paquin and Di Toro 2008; Naddy et al.

1354 2018). LC50 = median lethal concentration.

1355 Figure 3. Effect of pH on dissolved zinc (upper left) and copper toxicity (upper right) to Daphnia 1356 magna and Pseudokirchneriella. The figure for zinc shows the originally reported 72-h median effect 1357 concentration (EC50) for algae biomass (Heijerick et al. 2002) and the 21-d reproductive EC50 1358 (Heijerick et al. 2005). The figure for copper shows simulated toxicity data for the same endpoints, 1359 using multiple linear regression models fitted to data from a multivariate test design, as reported for 1360 algae (De Schamphelaere et al. 2003) and *D. magna* (De Schamphelaere and Janssen 2004b). The 2 1361 upper panels show a clearly distinct effect trend of pH on dissolved metal toxicity and form clear 1362 examples that strongly suggest that merging algae and animal bioavailability models into a single 1363 model is not appropriate. The lower left panel shows that, when expressed on a free ion activity 1364 basis (data also from Heijerick et al. 2002, 2005), the direction of the effect of pH on zinc toxicity is 1365 the same for algae and *Daphnia*, but the magnitude of the effect is clearly stronger for algae than for 1366 daphnids. The strong effect on free zinc ion toxicity for algae dominates over the speciation effect of 1367 pH, overall resulting in increased toxicity at higher pH for algae. In contrast, at higher pH, the 1368 speciation effect dominates for *Daphnia*, explaining the decreasing toxicity toward higher pH levels. 1369 A similar reasoning applies to copper (not shown). Data in the lower left panel have been used to 1370 construct and apply separate bioavailability models for algae and invertebrates in normalizing 1371 toxicity data for criteria and predicted-no-effect concentration derivation in Europe. The lower right 1372 panel shows possible regulatory implications of the different bioavailability relationships with pH 1373 (data taken from Supplementary 5 in Van Sprang et al. [2009]). The sensitivity ratio of algae versus 1374 invertebrates (geometric mean of normalized no-observed-effect concentration of all 1375 invertebrates/algae) is simulated as a function of pH for 2250 water samples. This panel shows that, 1376 although on average algae show similar sensitivity as invertebrates at low pH (~6.5), algae become 1377 by far more sensitive with increasing pH, up to approximately 10-fold and more at pH 8 and above. 1378 Algae also become increasingly more sensitive than invertebrates at higher pH for copper and lead 1379 (not shown). NOEC = no-observed-effect concentration.

1380 Figure 4. Simulated relationships between toxicity of the free metal ion and pH, presented on a log-1381 scale versus pH (upper panel) or on a linear scale versus H<sup>+</sup> ion activity, according to various 1382 assumed mechanisms, that is, the classic biotic ligand model (BLM) with a unidentate binding site 1383 (blue), a BLM with a bidentate binding site (orange), contribution of the hydroxide complex to 1384 toxicity (gray), and assuming that humic acid is a good multiple-site surrogate for the biotic ligand. 1385 This figure shows that, even if the emerging relationships are not perfectly linear (except for the 1386 classic BLM in the lower panel and the bidentate model in the upper panel), reasonably good linear 1387 fits can be obtained. ECx = x% effect concentration; WHAM = Windermere humic aqueous model.

Figure 5. An example of nonunique solutions possible when deriving biotic ligand models by fittingtoxicity test data without regard to actual critical accumulations (LA50). The parameters for model A

- 1390 are grounded in experimental findings. Model B fits the toxicity data just as well, even though the
- 1391 large reciprocal changes to the log K and critical accumulation fractions make the latter
- physiologically implausible (see online Supplemental Data SI-2 in Farley et al. 2015). The solid
- diagonal line is the line of 1:1 agreement; the dotted and dashed diagonal lines are a factor of ±2
- deviations from the 1:1 line. BL = biotic ligand; LA50 = short-term accumulation at the biotic ligand
- that is predictive of 50% mortality at a later time; LC50 = median lethal concentration.
- Figure 6. (A) Modeled 30-d 20% lethal concentrations (LC20s) as a function of dissolved organic carbon (DOC; at pH 7) for rainbow trout (more sensitive) and a 10 times less sensitive hypothetical fish species, presented on linear and log scale, and (B) 30-d LC20s as a function of DOC for rainbow trout at pH 6 and 8, presented on linear and log scale. ECx = x% effect concentration.
- Figure 7. Biotic ligand models (BLMs) assume equilibrium conditions, which may not be true with metal-dissolved organic carbon (DOC) binding that can take up to 24 h to reach equilibrium in some tests. The data shown here for Cu and DOC sampled in a stream during a rainstorm show that concentrations can change rapidly and not necessarily in synchrony. Copper is expected to have greater bioavailability and toxicity in nonequilibrium conditions than would be predicted by equilibrium-based BLMs. Data from Balistrieri et al. (2012).
- Figure 8. Comparisons of biotic ligand model (BLM)–predicted and measured fathead minnow median lethal concentrations (LC50s) in flow-through and static test designs. (A) Repeated tests of same-age fish from the same broodstock in constant exposure water (unamended Lake Superior
- 1409 reference water) varied by a factor of approximately  $\pm 2$ , which is the origin of the "factor-of-2" rule
- of thumb for evaluating BLM performance. (B) Measured and BLM-predicted LC50s from tests
   amending Lake Superior water with added major ions or dissolved organic carbon. Both comparisons
- 1412 show that Cu tended to be more toxic in flow-through than static test designs, which is likely at least
- 1413 partially related to nonequilibrium conditions in the flow-through tests. Original data from Erickson
- 1414 et al. (1996) plotted after Santore et al. (2001) but using the US Environmental Protection Agency's
- 1415 (2007) updated fathead minnow species mean critical accumulation value of 2.97 nmol/g wet
- 1416 weight. The solid diagonal line is the line of 1:1 agreement; the dotted and dashed diagonal lines are
- 1417 a factor of ±2 deviations from the 1:1 line.
- Figure 9. Kinetic patterns of free Cu concentrations over the course of a toxicity test in the presenceof 5 mg/L dissolved organic carbon in 4 different hypothetical experimental conditions. In each
- simulation, the dissolved Cu concentration is 10 µg/L. In each panel, the free Cu concentration at
- 1421 equilibrium is shown as a horizontal dashed blue line, and the simulated free Cu in the experiment as
- 1422 a function of time is shown as a red line. For a static exposure with no pre-equilibration (A), the free
- 1423 Cu (Cu<sup>2+</sup>) at the start of the test is elevated but decreases over time until it is near equilibrium at
- approximately 30 h. For a static exposure with a 24-h pre-equilibration period (B), the free Cu is
- 1425 close to equilibrium for the entire test duration. For a static test with daily renewals (C), the free Cu
- 1426 is elevated at the beginning of each renewal and then decreases but never reaches equilibrium. In a
- 1427 flow-through test (D) with a 1-h residence time, the free Cu is constant but far from equilibrium.
- 1428 Figure 10. Laboratory toxicity testing of metals with increased dissolved organic matter (DOM)
- should consider metal–DOM equilibrium time. Silver was more toxic to Daphnia magna (lower 24-h
- 1430 LC50s) in tests initiated after 3-h metal–DOM contact time than in tests initiated after 24-h contact
- time (Glover et al. 2005). DOC = dissolved organic carbon; LC50 = median lethal concentration.
- 1432



### 1433 Figure 1.











## 1442 Figure 4.



#### 1445 Figure 5.



## 1448 Figure 6.













