

Environmental Science Nano

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Nano-Impact Statement

Modeling studies are used to obtain information on environmental exposure concentrations of engineered nanomaterials. All model systems, including those describing nanomaterial fate and transport, always call for a validation by analytical data. However, in this case, there are currently only very limited measurements available and, further complicating the issue, it is difficult to distinguish between natural and engineered nanomaterials in many circumstances. In this perspective article we raise the point that it is currently not possible to validate modeled data on engineered nanomaterial concentrations in the environment, but rather that modeling and analytics can be used in tandem to provide an orthogonal view on the presence of nanomaterials in the environment.

1 **Perspective**

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3 **Progress towards the validation of modeled environmental concentrations of**
4 **engineered nanomaterials by analytical measurements**

5

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32 **Abstract**

33 Environmental exposure modeling has been used extensively in the last years to obtain
34 estimates of environmental concentrations of engineered nanomaterials (ENMs). In this
35 perspective piece, we explore the issues when aiming to validate modeled environmental
36 concentrations and propose options for both modelers and analytical chemists on how to
37 proceed in the future to better compliment one another's efforts. In this context, validation
38 means to determine the degree to which the simulation results from a model are accurate
39 representations of the real world by comparison with analytical data. Therefore, for such a
40 model validation procedure, analytical methods need to be available which provide
41 information in the same subject area. Currently, a major issue with nanometrology is that a
42 multitude of nanomaterials are present in natural systems but only some are ENMs; various
43 other particles of natural origin are abundant in the same systems. The analytical tools
44 available are not yet capable to distinguish the natural from engineered nanomaterials at
45 the low ENM concentrations expected in complex environmental matrices. However, both
46 modeling and analytical studies are able to provide an orthogonal view on nanomaterials:
47 modeling is able to yield estimates of the presence of ENMs in various environmental
48 compartments while analytics can provide physical characterization of ENMs in these
49 systems with hints towards the total nanomaterial concentration. While we need to make
50 strides to improve the two approaches separately, using the resulting data together in a
51 mutually supportive way will advance the field of ENM risk assessment.

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54 Introduction

55 Engineered nanomaterials (ENMs) have become an integral component of the materials
56 used in our society, with some materials used at volumes of tens of thousands of tons
57 annually¹. Despite widespread use and exponentially increasing research on their
58 environmental effects and behavior, very little analytical evidence exists about the presence
59 (concentration, form, etc.) of these materials in the environment, for example in freshwaters
60 and in technical systems such as wastewater treatment plants^{2,3}. In the last few years,
61 several modeling studies have been published⁴⁻⁷ that provide the first predictions of their
62 environmental concentrations on a large geographical scale and this exposure data has been
63 used for environmental risk assessments⁸. These modeled concentrations provide a
64 preliminary idea of current ENM concentrations in the environment and are therefore a
65 much-needed first step in providing an improved understanding of the actual risks that
66 ENMs pose to the environment. The perception of some stakeholders that ENMs may pose a
67 threat to the environment is fueled by many ecotoxicological studies that indeed find
68 adverse effects to the ecosphere⁹. ENM modeling studies, however, suggest that often ENM
69 concentrations are many times lower than the effect levels found by the toxicity tests. A
70 much more realistic picture of environmental ENM risk can be gained by using more precise
71 data than figures which are based only on hazard values.

72 To derive reliable findings from a model it has to be validated, which means to prove that it
73 is an accurate representation of a real world system. Validity is determined with respect to
74 the purposes for which the model was build, e.g. the ability for it to answer the questions on
75 which the model was developed and within the precision capable considering the input data
76 available at the time.¹⁰ For models predicting flows to the environment or environmental
77 concentrations, analytical measurements (concentrations, characteristics) of ENM in these
78 compartments are needed to ensure the models are based on realistic values. In the
79 following sections, we will present the different ways that modeling and analytical
80 technologies approach the determination of environmental exposure of ENM. It is from this
81 perspective that we explore the challenges we are faced with when attempting to validate
82 modeled environmental concentrations of ENMs and propose options for both modelers and
83 analytical chemists on how to proceed, and collaborate, in the future

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86 **The state of ENM exposure modeling**

87 The first models to predict ENM concentrations in the environment were material flow
88 analysis models (MFA) based on a life cycle perspective of products containing ENMs¹¹⁻¹³.
89 Most of these models are top-down models, which start with the production of a certain
90 mass of an ENM, distribute the mass to different product categories, and then identify the
91 releases to the environment during production, use and disposal, and finally quantify the
92 mass flows to technical and environmental compartments. Bottom-up models, starting with
93 product usage and market penetration of nano-products, have also been developed^{14, 15}.
94 Behavior of ENMs during technical processes, e.g. in wastewater treatment plants or during
95 waste incineration, can be described using transfer factors. It has been debated whether the
96 concept of transfer factors is applicable to ENMs, particularly if they need to be extrapolated
97 beyond the system based on which they were used¹⁶⁻¹⁸. Uncertainty within the models
98 originates from their limited coverage of realistic environmental fate processes, e.g.
99 dissolution, agglomeration and sedimentation in various compartments. Current MFA-
100 models do not distinguish between single ENMs, aggregated particles and ENMs attached to
101 larger particles (including microbes) but rather track the total mass of a specific ENM
102 through the system.

103 Environmental fate models (EFMs) that include a mechanistic handling of agglomeration,
104 hetero-agglomeration, sedimentation and other processes have been developed to allow a
105 more process-based description¹⁹⁻²¹. These models can be coupled to MFA models and may
106 potentially enable a more accurate description of the actual form of the ENMs. However,
107 they are strongly dependent on the input size distribution of the ENMs. To our knowledge,
108 no data are currently available on the form and size distribution of ENMs entering the
109 environment (either directly by release from products or indirectly through treatment
110 systems).

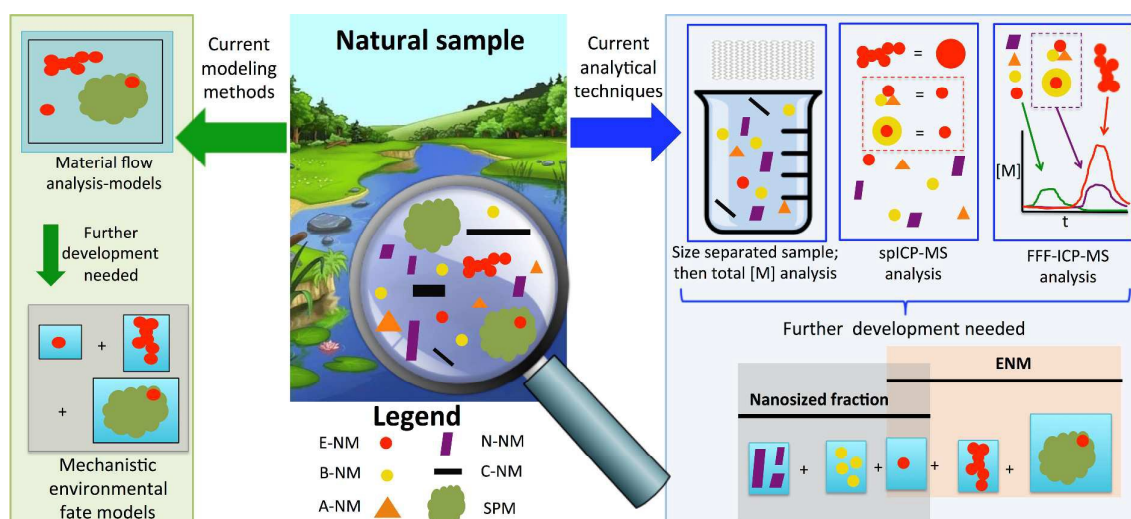
111 The majority of published ENM exposure model scenarios only consider the engineered
112 fraction of nanoparticles in the environment, but pigment TiO₂ has also recently been
113 modeled⁶. Because pigment-TiO₂ and nano-TiO₂ occur simultaneously in samples from
114 technical or environmental compartments, knowledge about the fraction of pigment-TiO₂ is
115 needed in order to relate the nano-TiO₂ flows to those of the pigment form, which has a
116 much higher production volume. However, so far no other model scenarios include other
117 forms of nano-scale materials.

118

119 **The state of ENM analytics in natural systems**

120 The analysis and characterization of pristine ENMs in suspension is well established and a
121 multitude of different methods can be used for a detailed description of materials²². There
122 has also been an improvement in our ability to measure ENM properties in complex media
123 under laboratory conditions²³. However, for natural samples, the measurement difficulties
124 are further increased from laboratory prepared complex samples because the ENMs only
125 constitute a part of the nano-sized fraction in the matrix. Formed by natural geogenic,
126 atmospheric and biological processes, environmental samples also contain other particles in
127 the size range from 1-100 nm, such as e.g. clays and iron oxides²⁴⁻²⁸. In addition,
128 nanoparticles are also formed by combustion processes, both natural (e.g. forest fires) as
129 well anthropogenic (e.g. fuel combustion)^{24, 29}. There are also other anthropogenic
130 nanoparticles which are inadvertently produced or released: mechanical forces on a material
131 matrix, such as sanding and polishing, lead to in high numbers of nano-sized particles even if
132 the material does not contain any ENM^{30, 31}. Another source of anthropogenic nano-sized
133 particles are pigments, e.g. TiO₂, that often have a particle size in the hundreds of
134 nanometers yet also contain a certain fraction extending into the sub-100 nm range^{32, 33}.
135 One of the main issues for environmental trace analysis is therefore that the ENMs are
136 always present in a matrix together with many other particulate materials, including nano-
137 scale materials (see Figure 1), and are often composed of the same elements as the ENMs
138 we are interested in detecting. Furthermore, the concentrations of ENMs are generally
139 lower than the natural background³⁴ which increases the difficulty of differentiating the
140 particles of interest (ENMs) from their natural analogs.

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144 *Figure 1: Natural waters are comprised of a multitude of different nano-sized species,*
 145 *including a variety of forms of ENMs. Both modeling and analytics must consider these*
 146 *species and find ways to incorporate and distinguish them in the modeling/measurement*
 147 *efforts.*

148 *Abbreviations: E-NM: engineered NM, BNM: bulk-derived NM, A-NM: abraded NM, N-NM:*
 149 *natural NM, C-NM: combustion generated NM, SPM: suspended particulate matter.*

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151 Current sample pretreatment and measurement techniques attempt to focus on a certain
 152 size fraction ($< 1 \mu\text{m}$, $< 0.45 \mu\text{m}$, $< 0.2 \mu\text{m}$, etc., depending on the separation method
 153 employed) but are not specific to ENMs. The situation is further complicated as sizing
 154 techniques are not able to specifically analyze ENMs adsorbed to larger particles because
 155 associated with larger particles will have been removed from the “nano” size fraction.
 156 Simply using a measurement of the nano-sized fraction as a proof of the presence or
 157 absence of ENMs will therefore give misleading results.

158 Even if the ENMs can be distinguished from natural NMs, sensitive techniques are required
 159 to analyze the low concentrations expected in environmental samples, often in the order of
 160 ng L^{-1} in aqueous samples or ng kg^{-1} in terrestrial samples⁶. The only currently known
 161 techniques that are both selective and sensitive enough to analyze inorganic ENM in
 162 complex environmental samples are ICP-MS based, demonstrated thus far in natural
 163 freshwater^{35, 36} and wastewater treatment effluent^{37, 38}. Single particle ICP-MS (spICP-MS) is
 164 capable of providing number-based size distributions of ENM in these samples³⁷, but the
 165 capability to size the particles varies upon the element of interest³⁹. While the size of some

166 nanomaterials (Au, Ag) can be measured down to a size of 6 nm or smaller⁴⁰, other ENMs,
167 such as TiO₂, can only be measured as small as ca. 50 nm⁴¹. Moreover, as shown in Figure 1
168 in the red dashed box, the standard spICP-MS method only measures the total mass of one
169 element. So, for example, an Ag-NP cannot be distinguished from an Ag₂S particle as the
170 measured silver mass per particle is recalculated into a size. This pitfall also complicates the
171 identification of separate components e.g. TiO₂ ENMs in an environmental sample from
172 other naturally occurring particles containing Ti³⁵.

173 Figure 1 shows how field flow fractionation (FFF) coupled to ICP-MS can distinguish
174 particulate material which has a different hydrodynamic diameter (e.g. Ag and
175 heteroagglomerated Ag-NP) and can assign the total mass of analyte associated with each
176 diameter distribution, but we would not know the number of particles per
177 (hetero)agglomerate. Coupling state-of-the art spICPMS techniques with FFF could provide
178 the broadest suite of information where knowledge of the number of particles per aggregate
179 allows distinguishing e.g. heteroagglomerated TiO₂ ENM from naturally occurring Ti
180 containing particles². However, the most recent developments in single particle time-of-
181 flight ICP-MS (spTOF-ICP-MS)⁴² or data collection in micro-second dwell times⁴³ promise
182 simultaneous multi-element capability in real time and open up the possibility of possibly
183 distinguishing ENMs from naturally occurring particles containing the same element at
184 environmentally realistic concentrations. The latter technique could potentially distinguish
185 homo- or heteroagglomerated particles from single particles, but large particles could
186 possibly not be distinguished from large aggregates. Finally, equally sensitive methods are
187 currently lacking for organic ENMs, such as carbon nanotubes, whereas for fullerenes
188 chromatography methods with low ng/L detection limits have been suggested⁴⁴.

189 To date, microscopy techniques have been widely used to measure NM size distribution,
190 crystal structure and to obtain elemental composition of NM under investigation when
191 coupled with x-ray energy dispersive spectroscopy (X-EDS) and electron energy loss
192 spectroscopy (EELS). Microscopy techniques have not been widely used to acquire particle
193 number concentration in the original samples material due to the inherent limitations of
194 sample recovery with the sample preparation approaches. Recently, with the development
195 of full recovery sample preparation techniques, it has been demonstrated that atomic force
196 microscopy (AFM) and transmission electron microscope (TEM) can both be applied
197 successfully to measure particle number concentration from a suspension at

198 environmentally realistic NM concentrations (ca. 0.2-100 $\mu\text{g L}^{-1}$ AuNPs)⁴⁵. Although this new
199 microscopy sample preparation approach enables fully quantitative recovery of NMs on the
200 TEM grid and thus enables number concentration measurements, the ENM concentrations
201 that current models predict are so low that obtaining a statistically significant count of
202 nanoparticles in natural samples still proves challenging.

203 In combination with nano-specific techniques, traditional bulk analytical methods can
204 provide useful information for identifying the presence of ENMs in complex samples. A
205 prerequisite is that the presence of ENMs in the sample can be identified by changes in the
206 composition of the sampled material compared to the natural background. An example,
207 which is unfortunately not applicable to industrial materials, is the stable isotope labeling of
208 ENMs and analysis with ICP-MS⁴⁶ that provides extremely low detection limits for e.g. ZnO
209 NPs below the natural background. Possible identifiers for unlabeled ENMs are the total
210 elemental concentrations (if natural background of the ENM constituting element or a
211 traceable impurity in the ENMs are very low compared to the amount of ENM introduced),
212 elemental ratios and isotopic ratios. The elemental composition of natural colloids and
213 nanomaterials are typically more diverse than their pristine manufactured counterparts,
214 which often contain very few impurities, making signal specific identification of ENMs a
215 possibility². Elemental ratios of Ti to Al and Nb have been used to determine the release of
216 TiO_2 ENMs from sunscreen products into surface waters during swimming³⁵. Isotopic ratios
217 of certain elements exhibit geographic differences and may reveal the presence of industrial
218 material⁴⁷. Similarly, when the mix of crystal structures of a mineral is different in ENMs than
219 what is expected of the minerals in a certain geographic region, this difference could be used
220 as a key for identifying the presence of ENMs.

221 In summary, bulk analysis contains information for both natural and engineered materials of
222 all sizes and shapes and therefore, several criteria must be met in order for it to be used in
223 detecting ENMs. First, the ENM must possess a property that enables a distinction from the
224 natural background (e.g. an impurity not found in the natural particulate matter or an
225 elemental or isotopic ratio that changes the respective ratio found in the background). The
226 natural variation of this property in the background and the rate of change of introduced
227 mass of ENM into the background determine the sensitivity of the method for the ENM.
228 Secondly, a baseline for natural levels of a given element should be established, or, if the
229 release has a temporal variation, time-resolved sampling and analysis might be required.

230 Lastly, a great deal of information must be acquired on both local geochemical conditions
231 and consumer products available in the local market in order to exclude influence from
232 other, non-ENM sources. An example of the combination of bulk and nano-specific
233 techniques coupled with the proper data interpretation has been shown to be a powerful
234 tool for determining ENMs in natural samples, as seen in the case study for TiO₂ from
235 sunscreens³⁵.

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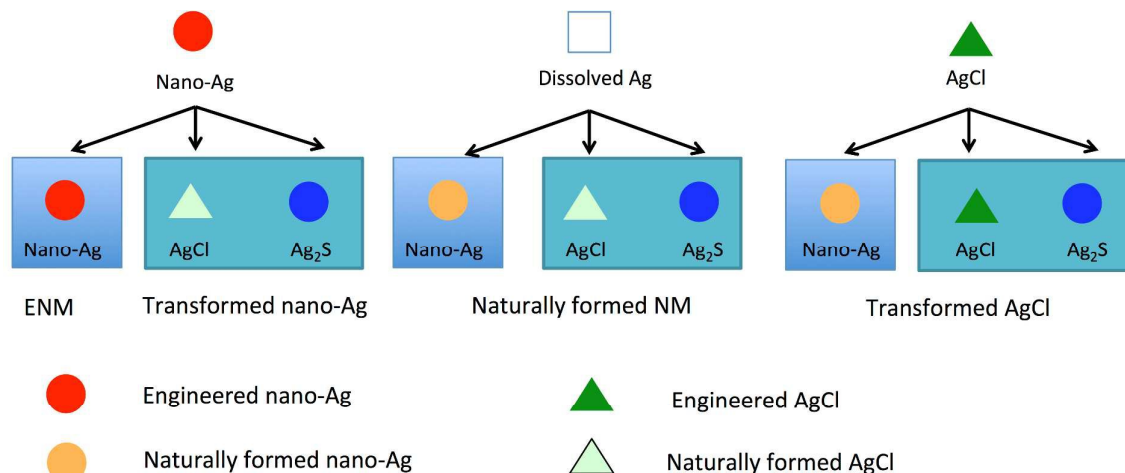
237 **Transformation reactions**

238 Another uncertainty further confounding the validation of modeled values by analytical
239 measurements are transformation reactions that ENM can undergo^{48, 49}. The current
240 knowledge on mechanistic fate/transformation reactions of ENMs in the environment does
241 not allow modelers to predict the likelihood of how (many) particles of a given ENM have
242 been transformed. The newest model by Sun et al.⁶, for example, considers sulfidation of
243 nano-Ag in wastewater treatment plants as a sink for nano-Ag. However, recent toxicology
244 data suggests it may be necessary to specifically model the further fate of the silver sulfides
245 formed⁵⁰.

246 Many ENMs (e.g. Ag, iron-oxide and ZnO) are highly dynamic and may undergo redox
247 reactions, dissolve and interact with other ions and re-precipitate as new nanomaterials.
248 Solutions which initially contain no nanomaterials, but rather contain either ionic or bulk
249 forms of a given metal, may eventually produce particulate matter similar to ENMs over
250 time^{51, 52}. This has taught us both that, i) ENMs cannot be assessed in their pristine
251 composition in the environment, and ii) that many conventional compounds can also exist at
252 the nanoscale.

253 While analytical methods can in some cases provide very sensitive particle number
254 concentration determinations in difficult media and even go so far as to provide clues as to
255 in which form the ENM may occur (e.g. metallic Ag vs. Ag₂S), it is unclear in which form they
256 were initially released into the environment. Ag₂S particles, for example, could also be
257 formed from dissolved Ag⁺ and other Ag-forms and not only from nano-Ag^{51, 53, 54}. An
258 example of this is shown in Figure 2, where there are three silver forms presented -
259 dissolved Ag⁺, nano-Ag(0) and AgCl. Nano-Ag can be transformed into different silver forms
260 (AgCl, Ag₂S). Likewise, dissolved silver can also be transformed into nano-Ag(0), AgCl and
261 Ag₂S. The same applies to AgCl. The presence of nano-sized Ag particles can therefore not be

262 used to make any conclusions about the presence of engineered nano-Ag in the sample,
 263 since multiple starting materials produce the same material in the end⁵². Also, a method
 264 specific for metallic nano-Ag(0) alone cannot be used to draw a conclusion regarding the
 265 presence of a ENMs in the sample. To be able to do this we would need to go beyond just
 266 identifying metallic nano-Ag but also to use some additional methods, e.g. by analyzing
 267 impurities to clearly identify a nano-Ag particle as engineered.
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271 **Figure 2:** Possible nano-sized silver forms in the environment, originating both nano-Ag, AgCl
 272 and dissolved Ag. Only the (red) nano-Ag, displayed on the left side of the figure, is the
 273 species of interest that is targeted by modeling and/or should be targeted for analysis;
 274 whereas the naturally formed nano-Ag (orange) and other transformed nano-sized forms
 275 (e.g. natural nano-Ag or AgCl variants) need to be distinguished from it.

276

277 Validation of models by data

278 Mathematical models of natural systems always call for experimental validation by analytical
 279 data, either to prove that the model is accurately capturing the main aspects of the system
 280 or to show that significant deficiencies in the model still exist. Given the many assumptions
 281 that current models are required to make, performing a validation is clearly appropriate and
 282 recommended. However, we need to state that even in the absence of an operational model
 283 validation by analytical data, the models can still be validated conceptually, meaning that
 284 the underlying theories and assumptions of the conceptual model and the mathematics are
 285 correct¹⁰. Such models have their validity by providing either prospective estimations (in

286 case they refer to a future scenario) or being predictive in the sense that they allow to make
287 statements about current exposure even in the absence of analytical data. Most of the
288 models contain at least in some of the parameters worst-case assumptions and the
289 predicted environmental concentrations therefore represent worst-case scenarios.

290 The methodological approaches used in most of the models follow the procedures laid down
291 in the chemicals risk assessment⁵⁵ and thus the predicted concentrations derived by them
292 are based on accepted methods. In a “process validation”, the underlying physical and
293 chemical processes are validated, thus giving credibility to the model results. If a model
294 assumption is that ENM are bound to sediments⁵⁶ or other particles¹⁹, a validation of
295 sediment or particle behavior can serve as a validation for the prediction of the fate of ENM.
296 Aside from risk assessment, models may provide valuable information as to where
297 nanomaterials are likely to first be spotted in the environment, thus suggesting
298 possible/probable places for environmental chemists and nanometrologists to begin “nano-
299 prospecting” to test their analytical methods in more complex matrices with the greatest
300 change of finding nanomaterials. Spatially resolved models have been developed that can
301 predict hotspots for ENM, either on a continental scale⁵⁷, in a river network^{56, 58} or in a single
302 river¹⁹ or in specific lakes⁵⁹. Such models will be very useful because the analytical
303 measurements will be point measurements and thus for any validation predictions at
304 specific locations will be needed.

305 When aiming to validate the concentrations predicted by ENM exposure and fate models,
306 we need to take into account the factors discussed above: the presence of large
307 concentrations of natural NMs in samples and methodological shortcomings in the current
308 analytical methods to quantify all ENM forms, especially those bound to larger particles. In
309 addition, mechanistic models predict number concentrations of a particular size distribution
310 of ENM, whereas mass flow models predict mass concentrations. Some of the analytical
311 methods discussed above can provide number concentrations, but in most cases, a
312 validation of the ENM flow models would consist of, for example, measuring the ENM mass
313 flows in wastewater, which would validate the model assumptions on production, use and
314 release.

315 We have to raise the question about the need to model explicitly all different ENM species
316 compared to just modeling an average ENM, so the justification for scientific models with a
317 rigorous description of all processes compared to much simpler models relevant for risk

318 assessment. The models used for risk assessment should only contain a level of detail
319 needed in the risk assessment process and have to be compatible to the hazard data
320 generated in ecotoxicological studies.

321 A comparison of modeled and measured values has been made by Gottschalk et al.¹¹. There
322 the authors stated that modeled and measured results are not always comparable due to
323 the different forms and sizes of particles that analytics and modeling target. We can
324 highlight the disparity with two examples:

325 Kiser et al.⁶⁰ published data on nano-TiO₂ concentrations in treated wastewater that are
326 overlapping with the range predicted by modeling⁷. So does this count as validation? On first
327 sight yes, but not when delving into the matter: the size limit used in filtration was 700 nm,
328 so the “nano-fraction” also includes larger sized particles. On the other hand, the filtration
329 possibly removed nano-TiO₂ adsorbed to larger flocs. The “real” nano-TiO₂ concentration in
330 the effluent can therefore either be lower (because pigment TiO₂ has been erroneously
331 included in the analysis) or higher, because nano-TiO₂ adsorbed to larger particles has been
332 excluded from the analysis. Without more information on the actual TiO₂ presence in
333 wastewater a validation will not be possible. This means e.g. to have information on the
334 distinction between pigment and nano-TiO₂ or the analysis of nano-TiO₂ associated with
335 large flocs and/or improvement in the models to predict concentrations of nano-TiO₂ and
336 pigment TiO₂ in different size classes.

337 The second example is the study by Mitrano et al. on nano-Ag in wastewater³⁸ who reported
338 about 100 ng/l of nano-Ag in treated wastewater effluent measured by spICP-MS. This
339 concentration is again well within the range predicted by Gottschalk et al.⁷ and the
340 technique used provides the size of particle detected. So does this count as validation? Again
341 yes on first sight but when we consider the published data on Ag behavior during
342 wastewater treatment then the issue becomes complicated: it is likely that the measured Ag
343 particles are in fact nano Ag₂S, so transformed silver particles. The model by Gottschalk et
344 al.⁷ at that time did not contain any transformation information while the newer update by
345 Sun et al.⁶ does. In that model, Ag₂S is no longer considered because the model is specific to
346 metallic nano-Ag and sulfidation constitutes an elimination of metallic nano-Ag. In addition it
347 has been shown that also dissolved Ag and AgCl are transformed during wastewater
348 treatment into the same silver sulfide particles as nano-Ag^{51, 54}. The presence of Ag-

349 containing nanoparticles is therefore not a sufficient proof for the presence of nano-Ag but
350 rather the consequence of the silver chemistry in wastewater.

351 A validation of more mechanistic environmental fate models may be possible to some extent
352 in micro- or mesocosms because the initial system conditions can be controlled, the fate
353 pathways are clearly defined, the system is a closed circuit and the experiment can be
354 designed in order to tailor the analytical measurement needs to the ENMs added. Validation
355 of the models will require that the methods are used on well-characterized starting samples
356 of ENMs, e.g. with respect to isotopic, elemental and size signatures of materials in products
357 and as they transform. In a natural sample, the system cannot be characterized with the
358 same accuracy, especially with respect to the ENM entering the system. The assumption that
359 the ENMs present in the sample have the same properties as pristine ENM will lead to
360 misleading results as released and transformed ENM have completely different properties
361 than pristine ENMs^{61, 62}. With the expected improvement in the field of nanometrology in
362 complex and environmental samples, analytics could also help provide additional data for
363 the modeling community. Namely, as more precise characterization of nanomaterials is
364 possible in the environment, we will be able to better define how materials age and
365 transform over time in different environmental compartments. This chemical information
366 will inform the further flow of materials between environmental sectors so that models can
367 be adjusted regarding likely residence times and final fate.

368 We also need to question whether the challenges associated with the validation of modeled
369 concentrations are specific to ENMs. Successful environmental fate model validations have
370 been performed for organic pollutants and it has been shown, e.g. for DDT⁶³ or PFOS⁶⁴, that
371 model uncertainty is often related to uncertainties in emission rates, degradation rate
372 constants and differences between wastewater treatment plants. For many metals, similar
373 problems have historically been faced as those for ENM with which we are now presented:
374 metals are present in many different species in the environment, each with different
375 environmental behavior, e.g. dissolved metals, complexed metals, colloidal forms and metals
376 associated with suspended solids. Fate models that include different reactivities of different
377 metal species have been developed and successfully applied to simulate metals in the
378 environment⁶⁵.

379

380 **The way forward**

381 The view expressed in this perspective piece is that at a conceptual level the validation
382 requirements of modeled concentrations are difficult to reconcile with the results that
383 analytics will be able to provide – at least in the near future. There may well be many cases
384 where we may never be able to trace a particular NM found in the environment back to
385 whether it was emitted as an ENM or whether it is of natural origin. However, both modeling
386 and analytics are able to provide an orthogonal view on nanomaterials: modeling can
387 provide estimates of the presence of ENMs and analytics can provide estimates of the total
388 NM concentration and their characterization. We need to look at the two methods
389 separately and use their results in a mutually supportive way to move forward with the risk
390 assessment of ENMs. We need to be cautious when trying to use one of the two approaches
391 to validate the other as this is certainly going to be difficult if not impossible in the near
392 future. On the other hand, under well controlled lab based or micro/mesocosm set-ups, as
393 already reported in a few studies⁶⁶, experimental and fate-modeling approaches can and
394 should be used in the near term to validate the basic assumptions of fate models.

395 The way forward is therefore for the MFA models to be mainly improved on the side of input
396 data to reduce the uncertainties that result from missing or conflicting knowledge. For the
397 environmental fate models, the inclusion of particle-specific processes needs to be further
398 developed. In the current state of the science, the results from the models and the available
399 analytical data both provide the information necessary to obtain an up-to-date view on
400 exposure of NMs and ENMs in the environment.

401

402

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