

August 24, 2009

1. Memo to: EPA/IRIS Workgroup

From: Office of Science
NCEH/ATSDR

Re: Solicited comments on TCE Draft Document

The draft IRIS TCE document was reviewed by scientists at NCEH/ATSDR. We have the following comments:

1. We find the charge document and questions for reviewers appropriate and comprehensive.
2. We note the large magnitude of difference (3 orders) between ATSDR MRL's and the EPA RfC and RfD as summarized here:

1997 ATSDR MRL – inhalation Duration = 0.1 ppm	Acute duration = 2 ppm	Intermediate
1997 ATSDR MRL – oral available	Acute duration = 0.2 mg/kg/day	No chronic MRL
2009 EPA RfC	0.001 ppm	Chronic
2009 EPA RfD	0.0004 mg/kg/day	Chronic

We note that in 1997 ATSDR did not develop a chronic MRL because the exposure studies available at that time were insufficient to support the ATSDR process for deriving MRLs. EPA relied on some of the same pre-1997 studies as ATSDR, but was also able to include more recent studies. Additionally, the methodology used in development of the proposed IRIS RfC and RfD incorporates an enormous volume of literature(both pre and post 1997) in a meta-analysis process that differs from the ATSDR process. With these differences acknowledged, we note the 3 fold order of magnitude difference between ATSDR intermediate duration MRL (0.1ppm) and the proposed RfC (0.001 ppm) and invite comment/discussion on this.

3. These very low RfC and RfD values beckon public health discussion on how enforcement can be strengthened to reduce and prevent exposures as RfC and RfD values for chemicals begin to approach background or ambient air/water levels. We point out that the current TCE MCL is 5 ppb, and the proposed RfC is 0.001 ppm, or 1 ppb.

We thank you for the opportunity to participate in comments and in further discussion.

Submitted by

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