



PAH mixtures NASA comments 10\_28\_09

Issue: EPA's specific approach for PAHs raises areas of concern and potential inconsistencies in the application to PAH mixtures. As this approach has many differences from current risk assessment practices and EPA policies (e.g., EPA Guidelines for Carcinogen Risk Assessment (2005), EPA's 2005 Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, Guidelines for Carcinogenic Risk Assessment (1986)) for single chemical that EPA needs to substantiate its specific approach on PAH mixtures.

NASA requests that EPA strengthen and clarify its draft Peer Review questions to ensure consideration and peer review direction on these significant outstanding issues.

Again, NASA thanks EPA for the opportunity to review and comment on this draft risk assessment in the IRIS process.

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