Department of Defense Comments on the Revised Draft Toxicological Review of Hexachloroethane		
Comments submitted by: Chemical Material Risk Management Directorate	Organization: Department of Defense	Date Submitted: 25 March 2010

*Comment categories: Science or methods (S); Editorial, grammar/spelling, clarifications needed (E); or Other (O). Also please indicate if Major i.e. affects the outcome, conclusions or implementation of the assessment.

Comment No.	Section	Page & Paragraph (enter Global if report section-wide)	Comment	Suggested Action, Revision and References (if necessary)	Category*
1		Global	The revisions made to the Toxicological Review for Hexachloroethane improved the clarity of the document, the rationale for the approach taken in the risk assessment is much clearer. However, we still do not agree that the kidney toxicity exhibited in male rats is predictive of toxic effects that may be seen in humans. It is unfortunate that the analysis used to determine that there is insufficient evidence to support an alpha 2μglobulin-related mode of action per the 1991 EPA publication *Alpha2u-Globulin: Association with Chemically Induced Renal Toxicity and Neoplasia in the Male Rat* had to make that determination due to insufficiency that stems from data gaps. We would also like to point out that Table A-1 in this same publication includes hexachloroethane as substances that cause kidney tumors by an $alpha_{2u}$-globulin-mediated mechanism; we are unsure why this publication made this determination whereas the toxicological review does not.	We believe that the charge questions for the peer review are adequate to insure that our remaining issues will be addressed in the next round of review.	S/M