CEQ comments on IASC draft Ammonia Assessment

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History:

Our office appreciates the opportunity to review and comment on the draft ammonia assessment. The assessment is clearly written and the analyses appear to be scientifically sound. This is the second assessment provided to the interagency reviewers that uses the new format, which we continue to support.

We have a few minor comments on the format, including a suggestion that EPA consider reversing the order of the synthesis of major toxicological effects (section 1.1) and the weight of evidence evaluation for toxicological effects (1.2). The current order makes sense from an analytical perspective, but from a reader's perspective it might be helpful to start with the highest level review. We would also suggest that the synthesis section be retitled summary of major toxicological effects.

Because the new format presents less information about individual studies it might be helpful to include additional references to the HERO. Currently, the database is mentioned in the preamble and in the literature search section, but some readers may not focus these sections. We suggest that you add references to HERO in the Hazard ID chapter and Appendix A.

We do not have any substantive comments on the content of this assessment. The conclusion that there are insufficient data to derive an RfD is justified. Likewise, the conclusion that there is inadequate information to assess the carcinogenic potential is reasonable. The derivation of the RfC, including the choice of critical study/endpoint, and use of uncertainty factors, seems appropriate.

We thank you again for the opportunity to review this assessment and look forward the interagency discussion.

Regards,
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