Department of Defense Comments on
1, 2, 3-Trimethylbenzene Dose-Response Assessment and Supplemental Information

Comments submitted by: Chemical Material Risk Management Progam	Organization: Department of Defense	Date Submitted: 5/23/2012

*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	Pages	Comment	Suggested Action, Revision and References (if necessary)	*Category
1	1.1		Compared to the first IASD draft of trimethylbenzenes, EPA's synthesis of the toxicological data and integrated summary of information was greatly improved, such that the reader was able to understand basic information to assess each study.	N/A	S
2	1.1, Table 1-2	1-3	It doesn't seem mathematically possible for the % of lymphocytes to be 79.3 +/- 78% or 84 +/- 78% in a group of 10 rats. Even if 7 rats have 100% lymphocytes and 2 rats have 0% lymphocytes, the 10th rat must have 93% lymphocytes to yield an average of 79.3% lymphocytes; in this group, the SD would only be 41.9%	Please verify the % lymphocytes for the 1230 mg/m3 groups of rats.	S
3	1.1.3	1-10	EPA's consideration of possible "reversibility" of the neurologic effect (Korsak and Rydzynski 1996) is adequately discussed and the rationale for keeping this endpoint more convincing.	N/A	S

			We apreciate EPA's effort to address this issue.		
4	1.1.3	1-11	Compared to the first IASD draft of the TMB document the strengths and limitations of the database are more clearly discussed.	N/A	S