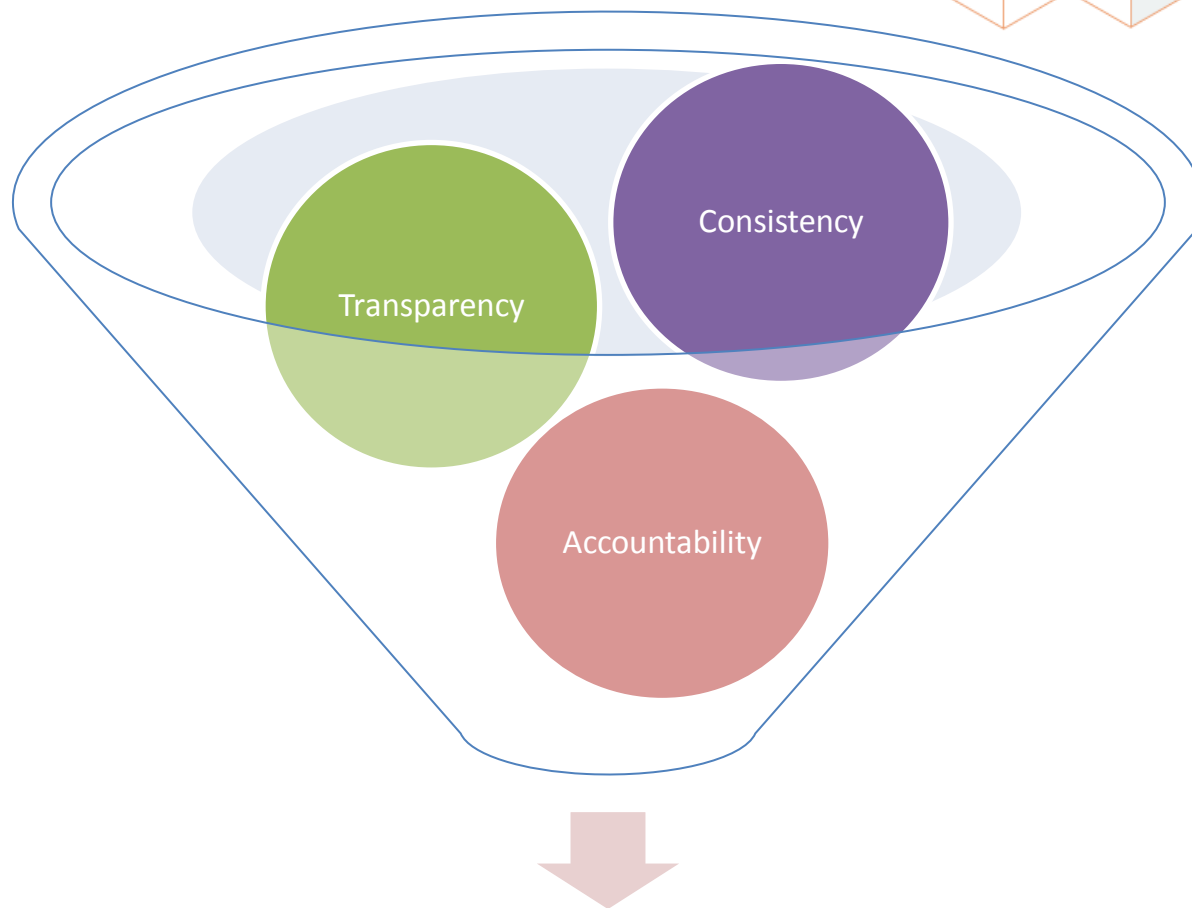December 12 - 13, 2013

COMMENTS FOR THE DECEMBER EPA BI-MONTHLY MEETING: BENZO(A)PYRENE

Kimberly Wise, PhD
ACC Center for Advancing Risk Assessment Science and Policy (ARASP)
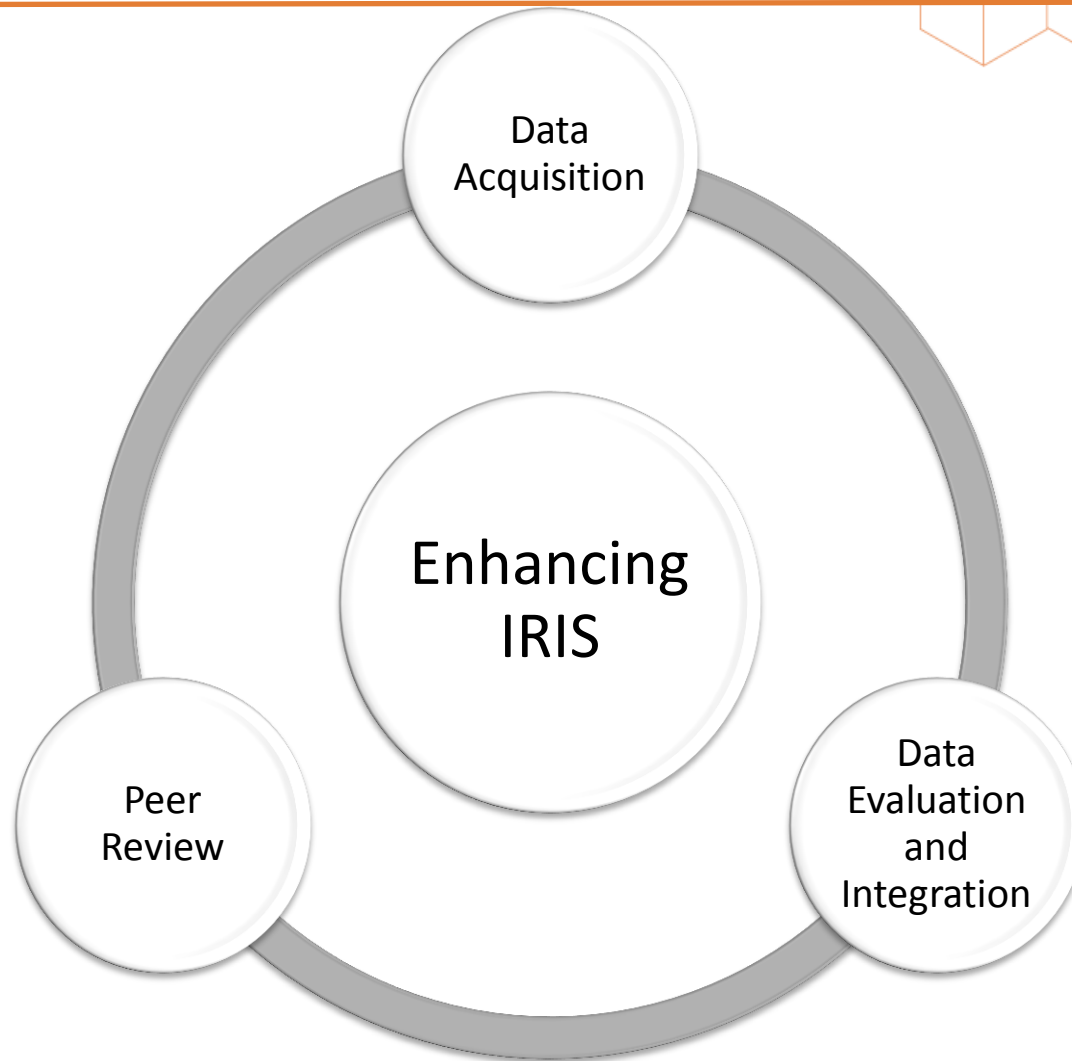
American Chemistry Council

Improving IRIS

High Quality Chemical Assessments

Key Areas for Enhancement

Improving Benzo[a]pyrene Assessment

Conduct Problem Formulation

➢ Identify the goals and scope of a BaP assessment

➢ Discuss the potential areas of concern for human health associated with relevant BaP exposure levels

Complete Data Quality Evaluations

➢ Clearly identify whether EPA considers the study to be of high, medium or low quality.

➢ Clearly identify study quality characteristics and describe how each of the studies meets, or does not meet, these criteria (e.g. for animal data, such criteria could include a clear evaluation of study design, sample size, statistical power, and the dose-response and exposure characterization)

➢ Include discussion of how the quality evaluation influenced a study's use in the weight of evidence evaluation

Improving Benzo[a]pyrene Assessment

Revise Evidence Tables

➢ Present all the data, positive and negative, equally within the evidence table

Improve Systematic Review

➢ Include all relevant information (e.g. studies involving exposure to BaP via the use of coal tar pharmaceuticals)

➢ Integrate all the information and explain why a decrease in anxiety, as measured in animal models, should be considered an adverse effect

➢ Provide a realistic timeline for completing and fully implementing all of the NRC recommendations

Robust Peer Review

➢ Include experts in dermal dosimetry on the peer review panel to evaluate the EPA's dermal slope factor and associated methodology

Summary

Path-forward