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To: IRISInterAgency, "flower.Lynnn"
Cc: "Leatherwood, James (HQ-LD020)"
Date: 05/17/2010 03:53 PM
Subject: RE: NCEA Interagency Communication #68 (draft revised charge for dioxin SAB review)

Dear Lyn Flowers, and the NCEA Teams;

NASA thanks EPA for its provision of an updated set of charge questions for the draft Dioxin risk assessment serving as the draft response to the NAS review. We appreciate EPA's consideration of the significant amount of interagency input to expand the initial draft charge questions to include specific scientific and technical issues. The interagency input, also documented in the individual agency submissions for the public record, highlighted EPA's use of new and alternative approaches and the need for peer review of these shifts in established methodologies and interpretation of technical guidance. For example, NASA suggested targeted peer review of EPA's approaches undertaken in this draft as to ensure support for sound scientific innovation and transparency, especially related to new or innovative evaluation methods and interpretation of established EPA guidance proposed by EPA in the draft. Such questions have been raised in EPA's charge questions for other single chemical risk assessments and are most appropriate for the draft Dioxin risk assessment.

Upon review of EPA's updated charge questions for the Dioxin review, we encourage EPA to incorporate the clear, detailed suggested expansion of the initial draft charge questions, provided by DoD to EPA and the larger interagency review group on April 13, 2010. EPA's updated draft charge questions do not address significant scientific and technical issues identified during the interagency review process. The DoD response to the initial EPA charge questions best captures many of the outstanding issues and agencies' request for peer review of EPA's new approaches. The DoD proposed language addresses many of the issue raised by NASA and other agencies with specific expansions of the proposed draft charge questions. We suggest integration of the key DoD issues and charge question language to support EPA's commitment to both scientific integrity and timely release of the draft to the public and the peer reviewers for comment. As part of the interagency review process, the DoD comments will be publicly available and again, integration of the detailed expansion of the charge questions does much address remaining interagency scientific and technical concerns.

NASA, upon review of EPA's updated charge question draft, identifies outstanding issues that remain inadequately addressed and requests EPA incorporate specific DoD language to strengthen the peer review process for the draft Dioxin risk assessment.

NASA again thanks EPA for the opportunity to review and comment, especially EPA's effort to address identified scientific and technical concerns through strengthened charge questions.

Linda Wennerberg