

Council on Environmental Quality (CEQ) Comments
NCEA Interagency Communication #128b (Transmission of science discussion draft
assessment appendices for trichloroethylene)
July 15, 2011

Thank you for the opportunity to review and comment on the draft Toxicological Review of trichloroethylene (TCE) dated June 2011. The draft Toxicological Review does an excellent job summarizing the available literature on TCE. We applaud the extensive external review and response to comment to which the TCE IRIS Review has been subject (http://cfpub.epa.gov/ncea/iris_drafts/recordisplay.cfm?deid=215006).

CEQ finds that the derived risk values are appropriately presented according to EPA guidance. We support the proposed RfD but question why the most sensitive candidate RfD (4×10^{-4} mg/kg-day; Peden-Adams et al. 2006) was not selected on its own. Instead, three co-studies (Peden-Adams et al. 2006; Keil et al. 2009; Johnson et al. 2003) were selected, and the end result is that the RfD increased to 5×10^{-4} mg/kg-day. Has EPA considered alternatively using these three co-critical studies to justify setting the overall RfD at 4×10^{-4} mg/kg-day under the premise that the most sensitive effect should be used as the basis for the risk value?

We agree that the applied uncertainty factors are appropriate and are consistent with EPA guidance. CEQ also supports the proposed RfC and the derived cancer slope factors. Finally, CEQ agrees with the finding of a mutagenic mode of action and with the recommendation to apply the default age-dependent adjustment factors where appropriate.