

**National Aeronautics and Space Administration (NASA) Comments on the Interagency Science  
Discussion Draft IRIS Assessment of Benzo[a]pyrene November 2016  
(Date Received December 15, 2016)**

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**General Science Comments:**

Below are the NASA comments, based on the review of the most current draft. NASA thanks EPA for the opportunity to review and comment on this updated draft (Step 6 of the IRIS process).

NASA notes that EPA provided significant edits to the previous draft to support conformance with IRIS commitments for more clear, concise assessments. NASA appreciates EPA's editing to provide a more readable document.

NASA also agrees with EPA's decision to remove the highly controversial dermal slope factor. The proposed dermal slope factor and its supporting documentation raised numerous scientific and technical questions and its removal strengthens the assessment.

NASA, in its interagency discussions, found clear substantive issues and alternative approaches identified by its Federal family colleagues, such as DoD. We strongly encourage EPA to integrate in the identified technical issues provided during this interagency review to improve the draft assessment and revisit the proposed action levels.

NASA also continues to question EPA's decision to consider BaP as an "index chemical" for the entire group of Polyaromatic Hydrocarbons. EPA does not provide a documented, sound case for this choice. NASA notes that BaP, with its very conservative approach, results in a potentially over restrictive approach to address the large number of PAHs in the environment without a defensible justification. NASA requests EPA reconsider this approach and target BaP as one chemical.

Again, NASA thanks EPA for the opportunity to review and comment on the updated draft BaP assessment.