

Meeting Summary

and item resolution denoted in [brackets] as of May 22, 2020

Chloroprene: PBPK Discussion

Representatives of USEPA and Denka Performance Elastomer

February 24, 2020 11-12 EDT

USEPA Facilities: B301 in RTP/WJCN 5400 in DC

Attendees:

ORD:

- Jennifer Orme-Zavaleta
- David Dunlap
- Wayne Cascio
- Emma Lavoie
- Kris Thayer
- John Vandenberg
- Paul Schlosser
- Lindsay Jones
- Allen Davis
- Andrew Kraft
- Bill Russo
- Vicki Soto
- Dahnish Shams

OAR:

- Anne Idsal
- Kelley Raymond

Denka/Ramboll:

- Patrick Walsh
- Robinan Gentry
- Harvey Clewell
- Mel Anderson

Attachments: Agenda and overview of draft scientific issues/charge questions

Peer Review:

- Contract is expected to be bid during the weeks of March 9th or March 16th. Once awarded, the contractor will look for experts and do a conflict of interest evaluation, in accordance with EPA guidelines and policies¹.
 - The peer review meeting [will be a virtual public meeting]. The contractor will be responsible for scheduling/organizing the meeting.

¹ EPA Peer Review Handbook, <https://www.epa.gov/osa/peer-review-handbook-4th-edition-2015>

- There will not be a consensus report but instead each panel member will provide comments. The contractor may organize the comments but will provide comments verbatim.
 - There can be a significant time difference between a contractor-led panel peer review versus a Federal Advisory Committee Act (FACA) panel peer review, which includes consensus. FACA panels usually take up to a year whereas contractor panels can be done within 90 days generally.
- There will be a federal register notice with a public comment period. Materials will be posted on the EPA website.
- The contractor will identify ~16 reviewers and will pick ~8 to be on the panel. Generally, EPA will only see a list of names to identify conflicts of interest if known.

Action Item: EPA will share names of potential peer reviewers with the public (including Ramboll/Denka) to identify any individuals with conflict of interest. [subsequent to the meeting EPA determination is: Because this is an independent, contractor-led peer review, we will follow processes consistent with EPA's Peer Review Handbook. The pool of proposed peer reviewers identified by the contractor will be released publicly. Ramboll/Denka, EPA, and other stakeholders will have the opportunity to submit feedback on potential conflicts of interest directly to the contractor. The contractor will select the final peer review panel. Proposed peer reviewers will sign a COI declaration.]
- Charge questions need to be agreed upon between EPA and Ramboll/Denka. Peer reviewers are usually guided to comment on specific aspects of a model and generally there is one question on the scientific validity of the model as a whole.

Action Item: In light of the RFR and the Agency's need to ensure an unbiased review of the PBPK model, share and agree upon draft charge questions to peer reviewers with Denka/Ramboll for their feedback.
- EPA is currently working on an uncertainty analysis of the human lung data. Ramboll/Denka has not seen the analysis, but based on discussions at the meeting, did not feel that the available data are adequate to support any such analysis.

Action Item: Share analysis with Denka/Ramboll as soon as available for awareness before it is submitted to the peer reviewers. Denka/Ramboll can provide comments on the review prior to submission to the peer reviewers and during the public comment session of the peer-review.
- Discussion that EPA/Ramboll would do a joint introductory presentation to the peer review panel during the public meeting. Ramboll has indicated that some of the materials were developed based on EPA input and they would like that to be communicated to the reviewers. Decision: A joint presentation will be developed.

Action Item: EPA and Denka/Ramboll to develop joint draft presentation including a discussion regarding which pieces of the model have been modified based on EPA input.
- Materials should be going to the peer review contractor in about a month. [update: in early June 2020]
- Charge questions:
 - Charge questions will be developed to submit to the contractors along with the PBPK modeling materials.
 - Ramboll has indicated that some of the parameters in the model were re-estimated based on EPA recommendations and some of the approaches that were incorporated in the modeling have been previously used in EPA PBPK models for IRIS assessments.

Ramboll would like for these EPA recommendations and previous approaches to be identified to the reviewers.

- A draft document on scientific issues to be considered for the development of the charge material has been provided as an attachment and EPA is asking for Denka/Ramboll's comments.

Action Item: Denka/Ramboll to provide comments on science areas for charge to peer reviewers and will add text providing background on the model. EPA will consider Denka/Ramboll comments prior to submitting to peer reviewers.

- Evaluation of Draft Ramboll Report and Model by EPA
 - Paul Schlosser has finished his review of the draft materials provided by Ramboll and provided comments to Ramboll. Paul has collated his comments in a Summary of Issues on the Model Identified by EPA document (attached).
 - The multiple emails received by Ramboll scientists during EPA's review of the chloroprene model were meant to be helpful to the completeness of the model, but are suggestions. Although the EPA Quality Assurance Program Plan (QAPP) was provided to Ramboll, it was meant to be helpful and not guidance. Ramboll can exercise their discretion in what they accept. However, in the spirit of collaboration, some revisions to the model have been included strictly at the request of EPA. EPA considers the review assistance complete – EPA will not provide an audit of completeness or approval of revisions in response to the EPA suggestions.

Action Item: After receiving Summary of Issues on the Model, Ramboll to provide completed materials to EPA (final report, appendices, and spreadsheets commented on by EPA).

Summary of Action Items:

- EPA will generate an FR notice to announce the peer review and will post the materials on the EPA website. [update: FRN has been developed and is under review at EPA]
- EPA will investigate sharing of names of potential peer reviewers with the public (including Ramboll/Denka) to identify any individuals with conflict of interest. [update: candidates will be published for public comment]
- EPA will share the EPA uncertainty analysis when it is complete. [update: completed May 15 2020 and will provide to Denka]
- EPA/Ramboll will work on a joint presentation to the peer review panel. [update: to be initiated once materials are submitted to peer reviewers]
- Ramboll/Denka will comment on a revised draft list of scientific issues for the peer review charge to be shared by EPA. [update: no change; draft charge questions have been developed for comment]
- EPA/Denka/Ramboll will develop, review and agree on charge document (context and questions) for the peer review panel. [update: underway]
- Ramboll will provide completed model materials and code to EPA to provide to the peer review contractor. [update: done]