

OMB Staff Comments on Chlordecone Final draft Tox Review and Final Draft IRIS Summary

General Comments:

OMB staff focused this review on EPA's responsiveness to the peer review comments and found EPA to be generally very responsive to peer reviewer concerns.

Scientific comments on Appendix A:

- Page A-7, in response to comments regarding EPA's BMD modeling approach, EPA states that they are doing as stated in EPA guidance. EPA should note that this guidance is only a draft and does not represent official agency position. As such, it would also be helpful for EPA to provide a scientific rationale for choosing the value with the lowest AIC, rather than averaging the values as the expert reviewer suggests. The reviewer noted that the differences in the AIC values were "extremely small" and differed by an "inconsequential amount".
- Page A-10, in describing peer review comments, EPA could improve the clarity of the description and EPA response by making clear that while 3 of the reviewers (the majority of reviewers) supported the classification of "likely to be carcinogenic", only 2 of the reviewers (a minority of reviewers) supported quantification of the cancer risk using the available data.

Comments on the Tox Review:

- EPA is stating, on page 72, and elsewhere that the cancer classification applies to all routes of exposure, stating that "chlordecone is likely to be carcinogenic to humans by all routes of exposure".
 - On page 72 of the tox review EPA states: "U.S. EPA's *Guidelines for Carcinogen Risk Assessment* (2005a) indicate that, for tumors occurring at a site other than the initial point of contact, the weight of evidence for carcinogenic potential may apply to all routes of exposure that have not been adequately tested at sufficient doses. No animal cancer bioassay data following inhalation exposure to chlordecone are available."
 - The cancer guidelines state (page 2-52): "When tumors occur at a site other than the point of initial contact, the descriptor generally applies to all exposure routes that have not been adequately tested at sufficient doses. An exception occurs when there is convincing information, e.g., toxicokinetic data that absorption does not occur by another route." However, at page A-8 the cancer guidelines also state: "For a route-to-route exposure extrapolation, the default option is that an agent that causes internal tumors by one route of exposure will be carcinogenic by another route if it is absorbed by the second route to give an internal dose. This is a qualitative option and is considered to be public-health protective. The rationale is that for internal tumors an internal dose is significant no matter what the route of exposure."
 - As EPA is stating that the chlordecone is likely to be carcinogenic *by all routes* of exposure, it would be useful to EPA to provide a summary discussion of information known regarding inhalation and dermal absorption and expected internal dose.