

**Department of Defense Comments on the
Draft External Peer Review Charge for PAH IRIS Assessment**

Comments submitted by: Office of the Secretary of Defense Chemical and Material Risk Management Directorate

Organization: Department of Defense

Date Submitted: 28 October 2009

*Comment categories: Science or methods (S); Editorial, grammar/spelling, clarifications needed (E); or Other (O). Also please indicate if Major i.e. affects the outcome, conclusions or implementation of the assessment.

Comment No.	Section	Page & Paragraph (enter "Global" if report section-wide)	Comment	Suggested Action, Revision and References (if necessary)	Category*
1	Chapter 2. Rationale for Recommending an RPF Approach	Pg. 1	<p>Edits to Question 5:</p> <p>Does the text adequately describe and evaluate the current weight of evidence supporting the assumption that PAHs as a chemical class have a similar mode of action according to EPA's 2005 cancer guidelines? Does the document adequately discuss the degree to which this hypothesis and other data support the assumption of response additivity that is a key component of a RPF approach?</p>	Please consider bolded edits.	E
2	Chapter 4. Evaluation of the Carcinogenicity of Individual PAHs	Pg. 2	<p>Edits to Question 8</p> <p>The methodology for the derivation of RPFs includes only studies where at least one PAH was tested at the same time as B[a]P. There are other studies available where a PAH was tested without concurrent testing of B[a]P, but where comparable B[a]P data are available from the same laboratory and test system, especially for in vivo studies. Should these data be used to estimate RPFs? Please discuss any advantages or disadvantages of excluding these data.</p>	Please consider bolded edits.	E/S

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3	Chapter 4. Evaluation of the Carcinogenicity of Individual PAHs	Pg. 2	Edits to Question 10; Do the sections describing different study types (e.g., 4.3.1-4.3.3) adequately explain the variety of methods used and the uncertainties from using more than one method?	Please consider bolded edits.	E/S
4	Chapter 7: Derivation of Summary RPFs for selected PAHs	Pg. 4	Edits for Question 24: Please comment on whether the scientific rationale for consideration of bioassay data versus cancer-endpoint data has been adequately described. Please comment separately on both , the use of tumor multiplicity data in the weight of evidence evaluations and also for determination of the RPFs.	Please consider bolded edits.	E/S