

MEMO

June 30, 2011

TO: Vince Cogliano (ORD/NCEA)
Norman Birchfield (ORD/NCEA)

FROM: Greg Miller (CEQ)

CC: Nikki Buffa (Associate Director, CEQ)

Comments on June 2011 Toxicological Review of Benzo[a]pyrene (Interagency Review Draft)

The draft Toxicological Review of Benzo[a]pyrene dated June 2011 does an excellent job summarizing the available literature on BaP. CEQ finds that the derived risk values are appropriately presented according to EPA guidance. We support the proposed RfD based on BMD modeling of the Xu et al. (2010) study and believe the appropriate uncertainty factors were applied. The use of a 3 for the database uncertainty factor is justified given the lack of a standard 2-generation reproductive study. CEQ also supports the derived RfC based on Archibong et al. (2002). The applied uncertainty factors are appropriate and are reasonably consistent with EPA guidance. Finally, we support the derived cancer slope factors. We agree with the finding of a mutagenic mode of action and agree with the recommendation to apply the age-dependent adjustment factors where appropriate.

Please contact Greg Miller if additional clarification is necessary.