

Council on Environmental Quality (CEQ) Comments on the Interagency Science Consultation Draft IRIS Assessment of RDX (dated September 2014)

Date: October 28, 2014

The Council on Environmental Quality (CEQ) appreciates the opportunity to review and comment on the draft Integrated Risk Information System (IRIS) assessment of RDX. The assessment is clearly written and the analyses appear to be scientifically sound.

I do not have any substantive comments on the content of this assessment. The derivation of the overall oral reference dose (RfD) based on nervous system effects (specifically convulsions) seems appropriate. Likewise, the derivation of the oral slope factor seems appropriate. I also agree with EPA's conclusion that the database for RDX provides "suggestive evidence of carcinogenic potential" by all routes of exposure.

Thank you again for the opportunity to review this assessment. I look forward to the interagency discussion.