

Comments on EPA's 2ND Draft Policy Assessment

Presented to CASAC July 26, 2010
on behalf of the
American Chemistry Council

Jay Turim, Ph.D.
Exponent, Inc.

Three Issues

- ▶ Comments we submitted on the ISA and the 1st draft of the Policy Assessment have not been addressed by EPA
- ▶ Risks estimated in a number of studies EPA relies on are implausibly high
- ▶ The Policy Assessment relies heavily on studies of the ACS II cohort yet serious limitations in the studies have never been acknowledged by EPA

Recommendations

- ▶ The Executive Summary should be rewritten
- ▶ The body of the Policy Assessment should present a balanced view of the studies relied upon, which includes a discussion of their limitations and inconsistencies