

04-10-12 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Lead Review Panel. These preliminary pre-meeting comments are from individual members of the Panel and do not represent CASAC consensus comments nor EPA policy. Do not cite or quote.

**Preliminary Comments from Dr. Sean Hays on
EPA's Integrated Science Assessment for Lead
(Second External Review Draft – February 2012)**

Comments on Chapter 4

I commend EPA for addressing the concerns I had with the previous version of Chapter 4. They have improved the transparency in the discussion and documentation of the Pb air-Pb blood correlations. They also expanded a discussion of the relative contributions of the various Pb sources/pathways towards PbB. A few specific comments:

- Summary of air-blood lead correlations is a helpful addition. Table 4-11 and Figure 4-22 are very helpful. It would be helpful for EPA to opine on which correlations will be most applicable for a risk assessment for air concentrations at and below the current NAAQS. The shape of the response curves are very divergent at low air concentrations, with the log-log models being the most divergent. EPA should conduct an independent analysis of the underlying studies and determine if a common model (linear, log-linear, or log-log model) can be used to describe all the datasets equally well. I would expect this to be an important discussion in the Exposure and Risk Assessment report released later this year.
- I appreciated the expanded discussion of the use of the IEUBK model to assess relative contributions of exposure sources/pathways towards blood lead concentrations for various percentiles of exposures (pages 4-5 – 4-6) and notations of expanded results available in Appendix I of the 2007 Pb Risk Assessment. This type of analysis will be critical for the Exposure and Risk Assessment report released later this year.