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OFFICE OF
THE ADMINISTRATOR

April 29, 1991

Honorable William K. Reilly
Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Subject: Science Advisory Board's Review of the Risk Assessment Forum's Draft Report "Occupational Exposure Limit Data in Relation to Inhalation Reference Concentrations."

Dear Mr. Reilly:

At a meeting on October 26, 1990, the Environmental Health Committee (EHC) of the Science Advisory Board reviewed a report prepared by the Agency's Risk Assessment Forum on the use of Occupational Exposure Limits (OEL) in setting Inhalation Reference Concentrations (RfCs). Specifically the Forum asked the SAB to comment upon the following Forum recommendations:

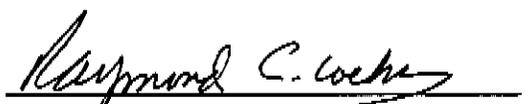
1. OEL values, per se, should not be used to develop inhalation RfCs.
2. An adequate scientific data base supporting an OEL may be used in the development of an inhalation RfC. Such data should be used in accordance with EPA's suggested methodology.
3. In the absence of an adequate data base, an RfC cannot be developed. Risk assessors then must make a professional judgement about protective levels of airborne toxicants based on whatever information is available. This information may include an OEL and its data base.
4. Once a determination is made that the existing data are inadequate, the Agency group expressing interest in the chemical should initiate action to see that data are developed through the interagency committee.

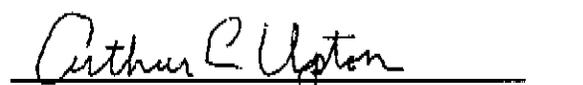
The EHC believes that it is very important that the Agency employ consistent methods to evaluate and assess toxicity information. The Committee recognizes that the methods used to define OELs can be subjective and can differ from the methods suggested by



the Agency. Hence the EHC heartily endorses the Risk Assessment Forum's above-noted recommendations on the use of OELs, adding only to the Forum's recommendation number 2 that data additional to that in the data base supporting an OEL, if available, should also be included when deriving an inhalation RfC. The EHC also suggests that OELs be incorporated for informational purposes within EPA documents deriving inhalation RfCs, and when there is a substantial difference between the OEL and the inhalation RfC, some discussion of this difference should be made.

We appreciate the opportunity to assist and provide advice on these issues, and look forward to your response.


Dr. Raymond Loehf, Chairman
Science Advisory Board


Dr. Arthur Upton, Chairman
Environmental Health Committee