



November 14, 2014

Mr. Aaron Y. Yeow  
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1200 Pennsylvania Avenue, N. W.  
Mail Code: 1400R  
Washington, DC 20460  
Sent via email to: [Yeow.aaron@Epa.gov](mailto:Yeow.aaron@Epa.gov)

RE: Draft Charge for the IRIS Evaluation of the Inhalation Carcinogenicity of Ethylene Oxide

Dear Mr. Yeow:

I wanted to take a moment to thank Dr. Thorne for lessening my concerns regarding the public comments on the draft Ethylene Oxide (EO) charge. During the first teleconference, on September 30<sup>th</sup>, I was pleased to hear Dr. Thorne state that all the public comments and recommendations for specific charge questions will be considered by the Chemical Assessment Advisory Committee (CAAC) members as they conduct their review and evaluate the draft charge questions provided by EPA.

In addition to the SAB handbook for members and consultants,<sup>1</sup> in FY2012, the SAB announced initiatives to improve public engagement with all stakeholders.<sup>2</sup> This was in response to feedback and recommendations the SAB received at a June 2011 session that specifically addressed public involvement activities. ACC actively participated during this session. These initiatives address seven important aspects of the review process:

- *Federal Register* notices published by the Staff Office will clarify that public comments are welcome on all technical materials prepared for or by an advisory committee, including the charge to the committee.
- The Staff Office and advisory committees will not accept a charge from the agency that unduly narrows the scope of an advisory activity.
- Time will be reserved on meeting agendas for committee members to discuss the charge.
- Following public comments at advisory committee meetings, chairs will ask committee or panel members if they have clarifying or follow-up questions for public presenters.

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<sup>1</sup> The SAB 2012 Handbook for SAB members and consultants is available here:

[http://yosemite.epa.gov/sab/sabproduct.nsf/WebBOARD/Serving%20on%20the%20EPA%20Science%20Advisory%20Board:%20A%20Handbook%20for%20Members%20and%20Consultants/\\$File/Serving%20on%20the%20EPA%20Science%20Advisory%20Board%20SABSO-12-001.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/WebBOARD/Serving%20on%20the%20EPA%20Science%20Advisory%20Board:%20A%20Handbook%20for%20Members%20and%20Consultants/$File/Serving%20on%20the%20EPA%20Science%20Advisory%20Board%20SABSO-12-001.pdf)

<sup>2</sup> The SAB FY 2012 initiatives, and associated background information can be found here:

<http://yosemite.epa.gov/sab/sabproduct.nsf/WebSABSO/PublicInvolvement?OpenDocument>.



- Chairs will offer a second brief opportunity for additional clarifying remarks from agency representatives or members of the public later in the meeting, as the committee or panel deliberates on responses to the charge questions.
- Advisory committee reports will acknowledge scientific information from the public that was helpful in forming the committee's conclusions and recommendations.
- Advisory committee reports will continue to focus on scientific and technical – rather than policy – issues, although reports may discuss the policy context and may note policy implications of technical findings.

ACC has supported the implementation of these initiatives as they recognize the importance of framing the charge questions appropriately and correctly. If the right questions are not presented objectively at the beginning of a review, when the Agency nears completion of the final IRIS assessment, reaching consensus is much harder as unanswered questions may remain. ACC was also very pleased to see that members of the public will now always be provided an opportunity to provide clarifying remarks later in the meeting. Often times we have seen that there is great expertise in the audience, but SAB members have declined to seek input from anyone other than agency scientists. Reaching out to all available experts should help inform the CAAC's review.

Finally, consistent with these initiatives, we look forward to seeing how the CAAC's report will use the information provided by the public. The CAAC's observations about what was helpful and informative, and ideally what was less helpful, will help outside experts as they engage in future reviews. The suggestions made by the EO experts on the draft charge were not made lightly and represent important scientific questions that should be addressed in an objective and transparent manner, considering all of the evidence. We look forward to seeing the CAAC responses to the specific issues that have been identified by EPA as well as stakeholders, including the EO experts that joined the first teleconference.

We appreciate the considerable time and effort the CAAC members will put into this review. We look forward to the CAAC recommendations that will assist EPA to not only finalize the EO assessment, but also to improve future IRIS assessments.

Sincerely,

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Nancy Beck, Ph.D.  
Senior Director  
Regulatory & Technical Affairs