



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

EPA-SAB-CON-91-001

November 21, 1990

OFFICE OF  
THE ADMINISTRATOR

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

Subject: Science Advisory Board's Consultation with the Office of Toxic Substances on their revision of the 1987 document "Assessment of Health Risks to Garment Workers And Certain Home Residents from Exposure to Formaldehyde."

Dear Mr. Reilly:

The Environmental Health Committee of the Science Advisory Board (SAB) met in Arlington Virginia, on October 25, 1990, to consult with the Office of Toxic Substances (OTS) on revisions to the formaldehyde assessment document noted above. A "consultation," as opposed to a "review," does not result in a formal written report, and is used to provide "front-end" or (in this case) "mid-course" assistance and guidance when requested by an EPA program.

The OTS requested SAB advice on four issues related to their revised assessment of formaldehyde:

1. Can reasonable estimates of human cancer risk be made for sites other than the nasal cavity?
2. Can DNA-protein cross-link (DPX) data provide a satisfactory measure of internal dose for cancer risk assessment? Is the use of monkey-derived DPX data adequately justified as a dose parameter for human cancer risk estimates? Is an interspecies scaling factor necessary?
3. Has OTS developed a reasonable quantitative risk estimate with the present information? If not, how should it proceed?

4. Are the cell proliferation data adequately addressed?  
Can the Committee advise as to how these data can be factored into quantitative cancer risk assessment?

The Committee provided initial responses to the OTS at the meeting, and is currently developing written advice which will be provided directly to the program. We expect that the SAB will hold a full review of the revised formaldehyde assessment document early in 1991.

We appreciate the opportunity to assist and provide advice on these issues. Because of the consultative nature of this activity, there are no specific findings, and we are not requesting any response from you at this time. We would of course be pleased to answer any questions on this topic that you may have.

*Raymond C. Loehr*

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Dr. Raymond Loehr, Chairman  
Science Advisory Board

*Arthur C. Upton*

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Dr. Arthur Upton, Chairman  
Environmental Health Committee