

Trichloroethylene (TCE):

Comments before the EPA Science Advisory Board TCE Panel

During the Conference Call, April 20, 2010

By Paul H. Dugard, PhD

On behalf of the Halogenated Solvents Industry Alliance, Inc. (HSIA)

Good afternoon. HSIA represents producers and users of trichloroethylene (TCE) and we have sponsored a number of toxicity studies and research projects on this solvent.

I understand only too well the daunting task before you and the last thing you would wish to hear is someone exhorting you to read even more. Nevertheless, I am suggesting that you do spend a little time reading the comments filed during the public review period. These address the most significant issues and have been developed by knowledgeable recognized experts. Fundamental issues of concern include:

Interpretation of epidemiological data. Authors: M. Kelsh, D. Alexander

Cancer classification: M. Dourson, M. Kelsh, D. Alexander

PBPK modeling: L. Sweeney

Developmental effects: C. Kimmel, G. Kimmel, J. DeSesso

TCE metabolism and kidney toxicity: W. Dekant

Calculation of RfC and RfD: L. Rhomberg

Risk assessment issues: HSIA (P. Dugard)

It is my understanding that EPA NCEA will provide these written comments to you.

We requested opportunities to provide longer presentations than 5 minutes at the face-to-face meeting of the TCE panel which might have reduced the need to read the written version of some of the comments. Unfortunately, this is not something that SAB has ever allowed. We will, however, make some or all of the authors available for your questions during the public meeting.

The Interagency Review of an earlier draft (similar in most respects the version that you have) led to a collection of comments covering similar issues to those I have listed already but also including additional topics. I commend the tabulated comments submitted by the Department of Defense as worthy of your attention. EPA may not provide you with these interagency comments but they are available through the NCEA website.

Finally, if you are not conversant with the literature for TCE in your own area of expertise, I would urge you to check some of the more important source references. NCEA has adopted an approach that allows selection of data without regard to the weight or quality of the evidence...as long as the outcome is worst case. This, I suppose, reflects policy, but some of the resultant distortions horrify me as a scientist.

Thank you for your attention.

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