

**Oral Statement of Kevin L. Bromberg
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**Before the EPA Science Advisory Board (SAB) Chemical Assessment Advisory Committee (CAAC)
Reviewing ETBE and tBA**

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I provided a written statement in August of last year before the CAAC – and I want to address the rat kidney issue and a general point about the role of public comments.

In the March 22 teleconference, there was a discussion that suggested that the panel is not expected to respond to public comments, but only to the EPA questions. This isn't quite true, and that idea is detrimental to eliciting quality public comments and quality peer review reports. Public comments do address the charge questions. The SAB and the EPA have been criticized properly for years for not adequately taking account of public comments.

These comments from experts commonly fill in gaps in EPA knowledge that also may not be adequately represented in the peer reviewer expertise. Indeed, the June 2016 public discussion on ETBE/tBA illustrates this point. It was unfortunate that EPA didn't incorporate that expert knowledge into its draft report, nor apparently seek the advice of pathologists. The NRC, in its 2014 IRIS update, was encouraged by EPA's efforts to bolster its overall scientific expertise, and noted that further work needed to be done, including gathering experts outside of EPA and the government. This is sound advice. Competent implementation of the NRC guidance requires that EPA do so. **EPA should take this opportunity to have a public session with pathologists and the EPA team to address the critical outstanding issues before completing the final assessment.**

With regard to the rat kidney issue, Professors Roberts and Rhomberg have correctly pointed to the inconsistencies and the lack of clarity in the current draft report which need to be remedied. For example, sometimes the report appears to be stating a consensus view, and then contradicts that with a contrary view of some panelists. However, the panel took steps in the March 22 meeting to fix these inconsistencies. I simply want to emphasize the importance of providing clarity regarding the two competing interpretations of the rat kidney data and their bases so that EPA is given clear directions on the next steps. The report should clearly separate the competing views and the consensus views on all issues.