

Comments to The draft SAB peer review report entitled “SAB Review of EPA’s Draft Toxicological Review of Ethyl Tertiary Butyl Ether and Draft Toxicological Review of *tert*-Butyl Alcohol(*tert*-Butanol)

Comment 1:

We strongly consider there are adequate data to support the contribution of PPAR, PXR and CAR to **MOA on** the liver tumorigenesis of ETBE in Fisher 344 male rats.

Comment 2:

We consider acetaldehyde does not contribute to liver tumorigenesis in animals based on the negative results of long-term carcinogenicity tests in rats by oral (Soffritti et al, 2002)¹⁾ or inhalation (Woutersen et al, 1986)²⁾ exposure.

1) Soffritti M, Belpoggi F, Lambertini L, Lauriola M, Padovani M and Maltoni C. [2002]. Results of long-term experimental studies on the carcinogenicity of formaldehyde and acetaldehyde in rats. Ann NY Acad Sci. 982: 87-105.

2) Woutersen RA, Appelman LM, Van Garderen-Hoetmer A and Feron VJ. [1986]. Inhalation toxicity of acetaldehyde in rats. III. Carcinogenicity study. Toxicology. 41: 213-231.

Comment 3: Initiation-promotion studies are reliable method for detecting promoting potential or carcinogenic potential. In general, to evaluate carcinogenicity of chemicals two-year carcinogenicity study is essential. Therefore, we consider that it is not appropriate to use the data of initiation-promotion studies as key evidence of cancer hazard characterization.