Message

From: White, Kimberly [Kimberly_White@americanchemistry.com]
Sent: 12/4/2017 1:22:13 PM
To: Orme-Zavaleta, Jennifer [Orme-Zavaleta.Jennifer@epa.gov]
Subject: Follow-up
Attachments: Mundt et al 2017 - Six Year aftr NRC Review.pdf

Dear Dr. Orme-Zavaleta,

Thank you for your initial response to my November 21st letter. Do you have availability for a 1 hour meeting in Washington, DC sometime during the week of January 22nd to discuss further?

Separately, I also wanted to alert you to a recently published article by Mundt et al. titled "Six years after the NRC Review of EPA's Draft IRIS Toxicological Review of Formaldehyde: Regulatory implications of new science in evaluating formaldehyde leukemogenicity". I have appended a copy of the in press version to this email and excerpted the abstract below.

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Regul Toxicol Pharmacol. 2017 Nov 17. pii: S0273-2300(17)30363-X. doi: 10.1016/j.yrtph.2017.11.006. [Epub ahead of print]

Six years after the NRC Review of EPA's Draft IRIS Toxicological Review of Formaldehyde: Regulatory implications o f new science in evaluating formaldehyde leukemogenicity.

Mundt KA[1], Gentry PR[2], Dell LD[2], Rodricks JV[2], Boffetta P[3].
Author information

Abstract

Shortly after the International Agency for Research on Cancer (IARC) determined that formaldehyde causes leukemia, the United States Environmental Protection Agency (EPA) released its Draft IRIS Toxicological Review of Formaldehyde, also concluding that formaldehydecauses leukemia. Peer review of the EPA Draft IRIS Assessment by a National Academy of Science committee noted that "causal determinations are not supported by the narrative provided in the draft" {NRC 2011}. They offered recommendations for improving the IRISreview and identified several important research gaps. Over the six years since the NRC peer review, significant new science has been published. We identify and summarize key NRC recommendations and map them to this new science, including extended analysis of epidemiological studies, updates of earlier occupational cohort studies, toxicological experiments using a sensitive mouse strain, mechanistic studies examining the role of exogenous versus endogenous formaldehyde in bone marrow, and several critical reviews. With few exceptions, new findings are consistently negative, and integration of all available evidence challenges the earlier conclusions that formaldehyde causes leukemia. Given formaldehyde's commercial importance, environmental ubiquity and endogenous production, accurate hazard classification and risk evaluation of whether exposure to formaldehyde from occupational, residential and consumer products causes leukemia are critical.

KEYWORDS:

Epidemiology; Evidence integration; Hazard evaluation; Mechanistic studies; Regulatory science; Toxicology

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Kind Regards,

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