Message

From: Flowers, Lynn [Flowers.Lynn@epa.gov]
Sent: 12/17/2015 1:13:27 PM
To: Pratt, Margaret [pratt.margaret@epa.gov]; D'Amico, Louis [DAmico.Louis@epa.gov]
CC: Hotchkiss, Andrew [Hotchkiss.Andrew@epa.gov]; Hogan, Karen [Hogan.Karen@epa.gov]; Fritz, Jason [Fritz.Jason@epa.gov]
Subject: RE: Potency Review of select PAHs - Health Canada project with TERA

Margaret: Thanks for sharing this. I will start off by being very to the point – we will NOT be sharing our draft information with TERA or any other contractor. I don't have anything against working with another regulatory organization, such as Health Canada – but we would never release our draft materials to anyone without a collaborative effort outlined first. i.e., working towards a single product, or parts of products, not disparate products.

Having said that –and climbing back down from my soap box ☺...here is a draft response:

Ex. 5 Deliberative Process (DP)

Lynn Flowers, PhD, DABT
Associate Director for Health
National Center for Environmental Assessment
US EPA
Washington, DC
703-347-8537

From: Pratt, Margaret
Sent: Wednesday, December 16, 2015 5:35 PM
To: D'Amico, Louis <DAmico.Louis@epa.gov>; Flowers, Lynn <Flowers.Lynn@epa.gov>
Cc: Hotchkiss, Andrew <Hotchkiss.Andrew@epa.gov>; Hogan, Karen <Hogan.Karen@epa.gov>; Fritz, Jason <Fritz.Jason@epa.gov>
Subject: FW: Potency Review of select PAHs - Health Canada project with TERA

Lou and Lynn,

Please see the message below and let me know how I/we should proceed regarding this request.

I'm happy to try to provide additional information upon request. Thanks!

Margaret

From: Louise White [mailto:louise.white@hc-sc.gc.ca]
Sent: Wednesday, December 16, 2015 4:14 PM
To: Pratt, Margaret <pratt.margaret@epa.gov>
Cc: Haber, Lynne (haberlt) <haberlt@ucmail.uc.edu>; Luigi Lorusso <luigi.lorusso@hc-sc.gc.ca>
Subject: Potency Review of select PAHs - Health Canada project with TERA

Hi Margaret,

Lynne Haber indicated that she spoke to you recently at the SRA conference about our project. I thought I would give you some background on our project and check with you if there is a possibility of a collaborative effort between the EPA and Health Canada..

I work for Health Canada Contaminated Sites Division. One of our responsibilities is to develop Soil Quality Guidelines for use at contaminated sites. We are currently undertaking a critical review of our soil guideline for carcinogenic PAHs. After reading the IRIS draft review of PAH potency (2010), our group felt it necessary that we critically review our potency approach for our soil guideline. The guideline uses a potency approach to determine guideline criteria for eight carcinogenic PAHs in addition to Benzo[a]pyrene.

In our guideline, PAH cancer Potency Equivalence Factors (PEFs) were adapted from one of the relative potency schemes described by the World Health Organization, with minor modifications (Kalberlah et al. 1995 cited in WHO/IPCS 1998. Relative potency schemes were based on the order of magnitude cancer potency. The current CCME approach is based on estimates derived 20 years ago and consequently, a review /update of PAH potency approach was needed.

We have contracted TERA to critically review 8 carcinogenic PAHs (listed in Table A. in the attached proposal) with the aim to use the approach suggested by EPA's Science Advisory Board (SAB, 2011) review of the draft IRIS document (2010). In our next fiscal year, we will be examining an additional 9 -10 PAHs which include a couple of alkyl-PAHs and other PAHs whose potency is potentially equal to or greater than B[a]P..In all, we plan to critically review approximately 20 PAHs.

We are hoping that you may be open to some collaboration on this project. We would be more than happy to share our spreadsheets and final report on the eight chemical listed below.

Benzo[a]anthracene
Benzo[b]fluoranthene
Benzo[j]fluoranthene
Benzo[k]fluoranthene
Benzo[g,h,i]perylene
Chrysene
Dibenzo[a,h]anthracene
Indeno[1,2,3-cd]pyrene

Because of issues with the falling Canadian dollar relative to the US$, awarding of the contract has been delayed. Consequently, TERA will only have 3 months to undertake the contract. We are hoping that should you be willing, the timeline would be more reasonable if TERA may be able to build on work already undertaken in the 2010 IRIS report. Specifically we are hoping for some assistance on the following with regards to the 8 PAHs listed above:

1. The updated literature searches undertaken by EPA as part of revising and updating the IRIS assessment in response to the SAB comments. Even better would be a list of identified relevant studies for the 8 PAHs for the update. The emphasis on TERA's searches would be from 2004 forward and the materials being requested here would only constitute a backup for TERA's searches
2. The underlying EXCEL spreadsheets used to support potency estimate calculations, especially C1, C6, and, if possible the spreadsheets showing how the RPFs were calculated from the BMD output.

I am hoping we could chat about this in the next couple of days. I am off for 2 weeks starting next week except I will be in the office the morning of Christmas Eve. However, I can make myself available next week if that fits better with your timetable.

Looking forward to talking with you.

Sincerely,

Louise

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(See attached file: TERA proposal - scope of work Dec 2015.docx)