UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN - 8 2007

OFFICE OF
RESEARCH AND DEVELOPMENT

Nancy Sandrof, M.P.H.
Manager, BFRIP
American Chemistry Council
1300 Wilson Boulevard
Arlington, Virginia 22209

Dear Ms. Sandrof:

Thank you for your letter of September 21, 2007, providing further comments on behalf of the American Chemistry Council's Brominated Flame Retardant Industry Panel (BFRIP) regarding the external peer review of the draft health assessments for the polybrominated diphenyl ethers (PBDEs). As mentioned, your letter follows up on our June 15, 2007, meeting during which EPA acknowledged your concerns and indicated that we would take actions to respond to some of these concerns. Following the outline laid out in your letter, I am pleased to have this opportunity to reply to your comments and answer your questions.

I. REVISION OF THE EXTERNAL PEER REVIEW REPORT

Your September 21 letter requested that the reason for the modification of the external peer review Final Report be conveyed on EPA's Web site. At the June 15 meeting, EPA listened to your concerns about a potential conflict of interest on the part of the Chairperson for the IRIS external peer review of the draft PBDEs Toxicological Reviews. At that time, we said we would consider your concerns and possibly make changes to the report. Since then, we have decided that the Chairperson's comments would not be considered in the EPA's response to the external peer reviewers and that the Chairperson's comments would be removed from the Final Report of the external peer review. Both of these actions have been taken. Further, EPA added a statement to the Integrated Risk Information System external peer review web site that indicates the change in the report is due to our determination that one of the panel members had a potential conflict of interest.

In addition, you requested more information concerning the ways in which the Agency intends to ensure that the Chairperson did not influence the views of the other PBDE peer review panelists. To evaluate the Chairperson's potential influence on the other peer review panelists, the initial and final comments received from all of the

external peer reviewers were comprehensively reviewed by EPA. This review revealed minor additions to the Final Report following the discussions during the public meeting and provided no evidence that the Chairperson significantly influenced the other panelists.

II. QUALITY AND USE OF THE VIBERG ET AL. STUDIES

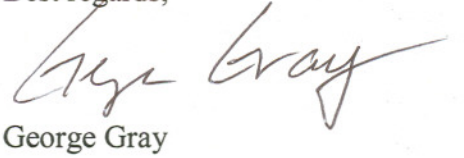
You also indicated concern about the quality of the Viberg et al. study, which was published in the peer reviewed literature, and the availability of the underlying data. In the draft Toxicological Reviews for the PBDEs, the Agency included a detailed summary of the Viberg et al. study design and methods. The selection of the principal study was included as a charge question during the external peer review of the PBDE IRIS assessments. The external peer reviewers acknowledged the limitations and concerns with the study. However, all of the reviewers agreed that the studies from the Eriksson/Viberg laboratory were appropriate for derivation of the RfDs for the PBDE congeners and that the studies' limitations were transparently discussed in the Toxicological Reviews. The neurobehavioral effects reported by the Eriksson/Viberg group are supported by multiple studies performed within this group and an expanding body of literature on PBDEs.[1] Additionally, the results from a study recently completed, but not yet published, by the U.S. EPA National Health and Environmental Effects Research Laboratory[2] details changes in motor and cognitive activity in rodents following administration of single or repeated perinatal doses of PBDEs, which are similar to the effects reported by Eriksson and Viberg.

III. TIMELINE/IRIS TRACK

Finally, you requested an update on progress of the IRIS reassessment, including a revised timeline. The completion dates for four PBDE IRIS assessments were changed to provide adequate time to address final interagency review comments. The IRIS Track will be updated weekly or more often to reflect the current estimated completion dates.

Again, thank you for your letter and your continued interest in EPA's IRIS assessment of the PBDEs. Should you have any questions, please contact me or you may contact Dr. John Vandenberg, Associate Director for Health, National Center for Environmental Assessment in the Office of Research and Development. Dr. Vandenberg may be reach at 919-541-4527 or by email at ***vandenberg.john@epa.gov.***

Best regards,



George Gray

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[1] Branchi et al., 2002; Kuriyama et al., 2005; Rice et al., 2007.

[2] Electronic mail from Ginger Moser, National Health and Environmental Effects Research Laboratory, Research Triangle Park, North Carolina, to Samantha Jones, U.S. EPA, dated August 14, 2007