

Advocacy Asks the EPA Science Advisory Board Not to Adopt the 2010 Draft Report Submitted by the Inorganic Arsenic Cancer Review Work Group

On June 9, 2010, the Office of Advocacy (“Advocacy”) submitted written comments to the Environmental Protection Agency (EPA) Science Advisory Board (SAB) asking the board not to adopt the 2010 Draft Report submitted by the Inorganic Arsenic Cancer Review Work Group (“Work Group”). Instead, Advocacy suggests the SAB complete a new updated science review that will include review of recent significant work.

A copy of Advocacy’s letter to the EPA SAB can be found at www.sba.gov/advo/

- The Work Group was convened to present additional recommendations on the implementation of key 2007 SAB recommendations concerning the draft 2010 “Toxicological Review of Inorganic Arsenic: In support of the Summary Information on the Integrated Risk Information System (IRIS).” This draft evaluated the potential cancer hazard of inorganic arsenic and included a quantitative dose-response cancer assessment.
- The outcome of this review is important to small businesses as acceptance of the proposed new cancer potency factor would result in a substantial increase in the number of small water systems having to spend significant resources to lower arsenic concentrations, perhaps without any potential health benefit. It also could affect Superfund cleanup levels.
- Advocacy identified numerous procedural deficiencies in the Working Group Review including an insufficient period for public review and comment, overly narrow charge questions, and failure to provide public comments to the Work Group until after the April 6th public meeting. Most importantly, it appears that the Work Group made no attempt to address the serious objections raised by the scientific testimony at the meeting.
- The Work Group did not adequately consider key scientific concerns, and did not seriously explore the mode of action literature. This analysis is essential to dose-response modeling and in determining whether arsenic has a threshold. The Work Group accepted EPA’s choice in using a linear approach for their risk assessment. Additionally, the Work Group did not properly review available epidemiological studies or examine the appropriateness of the reference population, which had much higher cancer rates than the study population for reasons unrelated to arsenic.
- Advocacy believes the SAB, consistent with its charge as an independent reviewer of EPA science assessments, should reject the Work Group’s report and complete a new science review, within a year, properly addressing current scientific concerns.

For more information, visit the SBA Office of Advocacy’s website at www.sba.gov/advo or contact Assistant Chief Counsel Kevin Bromberg by e-mail at Kevin.Bromberg@sba.gov or by phone at (202) 205-6964.