

MUSC

CHILDREN'S SERVICES

GENERAL PEDIATRICS
171 ASHLEY AVENUE
CHARLESTON • SC 29425

J. Rountt Reigart, MD
Director

William T. Basco, MD
Walton L. Ector, MD
Kelly Havig-Lipke, MD
Melissa Howard Henshaw, MD
Sherron Jackson, MD
Michelle Lally, MD
James R. Roberts, MD
Sara E. Schuh, MD
Hazel M. Webb, MD
Patricia D. Clark
(843) 792-5345
(843) 792-9223 Fax

Emergency Pediatrics
John W. Ringwood, MD
Barbara L. Kahn
(843) 953-8459
(843) 953-8458 Fax

General Pediatrics Research Group
Paul M. Darden, MD
Colleen M. Moran, MD
Donald Scott Davis, MHS
Linda DeRemer, RN
Patti W. Holsclaw, MHA
William Klauber, PA, MAT
Keith Browning
(843) 792-2979
(843) 792-2588 Fax

Primary Care Continuity Clinic
Paul M. Darden, MD
Director
(843) 792-3955
(843) 792-0330 Fax

Patient Appointments
General Pediatrics Clinic
(843) 953-8444
Primary Care Clinic
(843) 792-3955
Emergency Pediatrics
(843) 577-0600

May 26, 1999

Public Information and Records Integrity Branch
Information Resources and Services Division (7502C)
Office of Pesticide Programs
Environmental Protection Agency
Room 119, Crystal Mall #2
1921 Jefferson Davis Highway
Arlington VA
Re: Docket Control number OPP-00593

To Whom It May Concern:

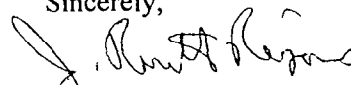
The Children's Health Protection Advisory Committee met on May 5-6, 1999 to continue its review of the science policy issue papers being prepared as part of the implementation of the Food Quality Protection Act. Specifically, the Committee and its Science Work Group appreciate the excellent briefings provided by EPA's Office of Pesticide Programs at a special meeting of the Science Work Group on April 15, concerning "Choosing a Percentile of Acute Dietary Exposure as a Threshold of Regulatory Concern", and by the USDA on its Continuing Survey of Food Intakes by Individuals.

It is clear to the Committee from the report of its Science Work Group that EPA, working in conjunction with the USDA, has carefully considered the dietary intakes of children in developing this issue paper. Further, the EPA has done an excellent job of outlining the issues associated with the probabilistic assessment of dietary exposures to pesticides; and in particular the regulatory policy question of how protective to be in making regulatory decisions using Monte Carlo probabilistic statistical exposure analyses. EPA has acknowledged the concerns regarding such analyses and the related policy decisions, and has raised the right questions, each of which the Committee strongly urges be examined carefully.

In reviewing the probabilistic assessment of exposure, the Committee asks the Agency to carefully consider the concern that children tend to exist at the extremes of probabilistic distributions both because of their unique physiology, and because their diets include both fewer foods than adults' diets and an often unpredictable preference for a single food. We urge that in setting thresholds of regulatory concern, EPA be clear about what the effects of those decisions are regarding the number and distribution of children falling outside a selected statistical threshold.

The Committee thanks you for the opportunity to comment.

Sincerely,



J. Rountt Reigart, MD
Chair, Children's Health Protection
Advisory Committee

R. Trovato, P. Goode