



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

JAN 25 2007

OFFICE OF POLICY,
ECONOMICS, AND INNOVATION

Melanie A. Marty, Ph.D.
Chair, Children's Health Protection Advisory Committee
Cal/EPA, Office of Environmental Health Hazard Assessment
1515 Clay St., 16th Floor
Oakland, CA 94612

Dear Dr. Marty:

I would like to thank you and the Children's Health Protection Advisory Committee (CHPAC) for your recent letter to Administrator Johnson concerning polybrominated diphenyl ethers (PBDEs). We are pleased that you considered EPA's PBDEs Project Plan in detail and share our interest in continued evaluation of this class of brominated flame retardants.

The PBDEs Project Plan released in March 2006 is a final document and, as such, will not be revised. Any follow-up activities on PBDEs, such as those recommended by the CHPAC, will be considered as part of the implementation of the Project Plan. We do plan to prepare status reports on EPA's progress in implementing the Project Plan, and to make these available on an annual basis. We are currently preparing the initial status report and intend to release it this spring. We will be happy to let you know when the status report is available.

We appreciate CHPAC's recommendations, which are all consistent with the directions EPA is pursuing on PBDEs. Assessment of children's exposures to PBDEs is critical to evaluation of these chemicals. The body burden data that are forthcoming from the National Health and Nutrition Evaluation Survey (NHANES) will be an important input to EPA's continuing evaluation of PBDEs; however, NHANES will not provide data for younger children. Many other sources of exposure-related information will have to be considered in addition to NHANES. EPA will consider available biomonitoring literature relevant for children (including breast milk data), and other research on early-life exposures. EPA is currently conducting an analysis of PBDE exposures, in responding to the exposure-related white papers identified as new activities in the PBDEs Project Plan (Activities 2.4 and 3.2). As part of this analysis, EPA is estimating PBDEs exposure via multiple pathways for infants, children (ages 1-5, 6-11 and 12-19), and adults. Pathways assessed include breastfeeding, food ingestion, water ingestion, house dust ingestion, house dust dermal contact, and inhalation. EPA is also modeling body burdens for infants, children and adults based on the estimated daily intakes.

Internet Address (URL) = <http://www.epa.gov>

Recycled/Recyclable - Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 50% Postconsumer content)

EPA is continuing to gather information for its evaluation of decaBDE. A draft of the revised Integrated Risk Information System (IRIS) assessment was released for public comment in December 2006, at <http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=161848> (Activity 2.1). EPA has provided additional guidance to the industry sponsor of the decaBDE assessment under the Voluntary Children's Chemical Evaluation Program, at <http://www.epa.gov/chemrtk/vccep/pubs/chem21.htm>, and expects that the sponsor will be conducting recommended testing on the environmental fate of decaBDE in 2007 (Activity 2.3). In addition, EPA is conducting the assessment of decaBDE environmental fate identified as a new activity in the PBDEs Project Plan (Activity 2.4), as part of the assessment of PBDEs exposure described above. EPA will consider all available information on decaBDE toxicity, exposure and environmental fate when it conducts its interim review of decaBDE (Activity 2.5). As part of that interim review, EPA will consider the need for further activities concerning decaBDE, including those you have recommended.

EPA and CHPAC agree on the importance of conducting careful and timely evaluations of a broad range of flame retardant alternatives, including new technologies for fire protection. The methodology for the assessment of pentaBDE alternatives conducted by the Furniture Flame Retardancy Partnership (FFRP) was developed in an open process by a broad group of diverse stakeholders, with extensive opportunity for public input and participation. While further analysis could have been conducted, we believe that the FFRP report was very useful in providing a great deal of information on alternatives to pentaBDE in a timely fashion. Timing was critical in this effort, as the analysis was developed concurrent with the need of the furniture industry to select preferred alternatives. EPA fully appreciates the need to consider technological innovations in fire protection that reduce the use of potentially harmful chemicals. Section 5 of the FFRP report presents a detailed discussion of considerations for selecting flame retardants, including a description of alternative technologies that can be used to achieve fire safety standards.

We appreciate your interest in PBDEs, and welcome any further input the CHPAC would like to provide regarding these chemicals and the related science and policy issues.

Sincerely,



Louise P. Wise
Principal Deputy Associate Administrator

cc: Charles Auer, OPPT
William Sanders, OCHP
Kevin Teichman, ORD
Laura Yoshii, Region 9
Valerie Washington, AO