



North American Metals Council
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March 22, 2016

Via Electronic Submission

Office of Research and Development Docket
U.S. Environmental Protection Agency
Mailcode: 28221T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: EPA External Review Draft of its Guidelines for Human Exposure Assessment; EPA-HQ-ORD-2015-0684; 81 Fed. Reg. 774 (Jan. 7, 2016)

Dear Sir or Madam:

The North American Metals Council (NAMC)¹ is pleased to provide these comments on the U.S. Environmental Protection Agency's (EPA) External Review Draft of its Guidelines for Human Exposure Assessment. In addition to these comments, NAMC also supports and incorporates by reference the comments submitted by the American Chemistry Council (ACC).

Naturally Occurring Substances

NAMC requests that the guidelines give additional attention to background chemical concentrations from naturally occurring sources and how those should be addressed in a human exposure assessment. This issue is of particular interest for NAMC because mineral forms of metals are naturally occurring in the environment and as such, all environmental media will have naturally occurring mixtures of metals. These concepts are listed as key principles in the 2007 EPA Framework for Metals Risk Assessment and should be likewise highlighted in the updated EPA human exposure assessment guidelines.

¹ NAMC is an unincorporated, not-for-profit group formed to provide a collective voice for North American metals producers and users (*i.e.*, the North American "metals industry") on science- and policy-based issues that affect metals in a generic way. NAMC members include trade associations as well as individual companies.



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EPA Framework for Metals Risk Assessment

In Section 1.2., Purpose and Scope of the Guidelines, the guidelines state that the updated document incorporates policy, methods, and data developed since the 1992 document, but does not specifically list the [2007 EPA Framework for Metals Risk Assessment](#) as an information source for the update. EPA has recognized that metals present unique risk assessment issues and prepared the Framework for Metals Risk Assessment to address those unique attributes and behaviors when assessing risks. We urge EPA to incorporate the policies and methods from the Framework for Metals Risk Assessment into the updated human exposure assessment guidelines, or provide a specific citation to the Framework as the appropriate source for determining human exposure to metals and metal compounds.

USGS Data for Screening Purposes

The U.S. Geological Survey (USGS) is listed in Table 5-6, Sources of Exposure Assessment Data, as a source for information on background levels of elements, including metals, in soils and other surficial materials. NAMC agrees that the use of USGS data may be useful as preliminary screens for metal exposures, but site-specific calculations may be necessary.

Thank you for the opportunity to comment.

Sincerely,

Kathleen M. Roberts
Executive Director, NAMC