
Comments on Inorganic Arsenic Key Science Issue 1: Response to NRC

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Gradient

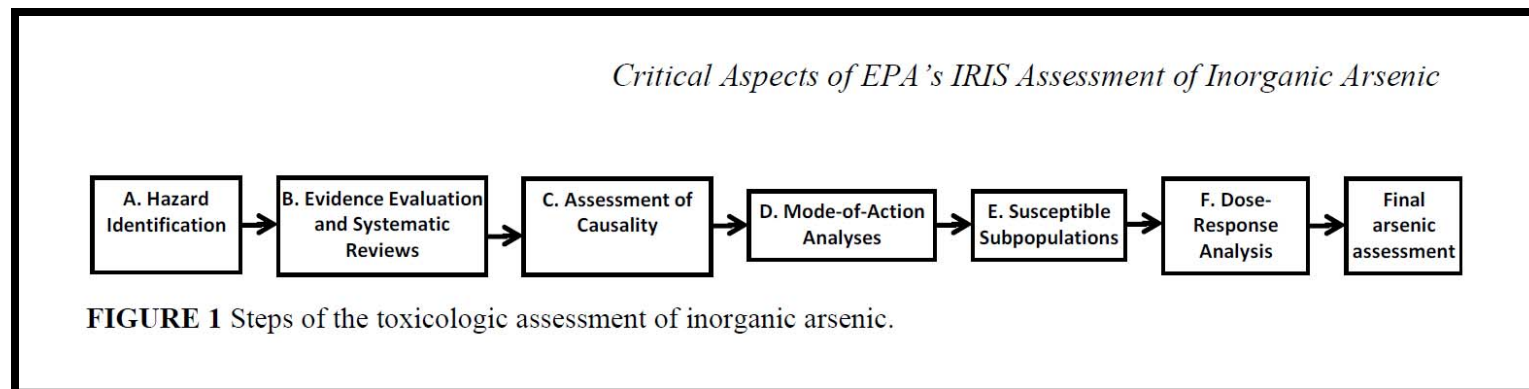
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Science Issue 1: Response to NRC

- Need for Weight of Evidence (WoE) causality evaluation for each endpoint in National Research Council (NRC) tiers
 - Tiers are nominations
 - Not based on WoE analysis
 - Need to consider in context of US populations/US exposure levels

Science Issue 1: Response to NRC

- NRC Figure 1 – Steps of Toxicologic Assessment
 - Linear, with Hazard Assessment first
 - However, subsequent steps bear on Hazard Assessment
 - Hazard Assessment needs to be an iterative approach, incorporating subsequent steps in Figure 1



Science Issue 1: Response to NRC

- Dose-Response
 - NRC – recommends use of Mode of Action (MoA) in evaluating dose-response model, but limited specificity provided in Chapter 7
 - Need to consider "limited extrapolation" method in view of MoA information and plausible hypothesis