



Integrated Risk Information System (IRIS) Public Science Meeting October 26, 2016 Ethyl Tertiary Butyl Ether

Session 4: Public Comment Session on the Draft Ethyl Tertiary Butyl Ether Assessment

Marcy I. Banton, DVM, PhD, DABVT

LyondellBasell



Public Comment Session on the Draft Ethyl Tertiary Butyl Ether Assessment

Background Information

The draft ETBE assessment makes a number of statements or misrepresentations pertaining to ETBE's usage in the U.S. and detection in groundwater that are not supported by the references in the document and therefore need to be corrected.

- The assessment should recognize that ETBE has not been commercially used in the U.S. since 1996, and is effectively blocked from use in U.S. gasoline in the foreseeable future.
- There is NO primary evidence presented that ETBE was in fact detected in ground water or soil in the US. EPA claims that the referenced 2003 report supports that ETBE is “commonly detected” near LUST contamination areas. That is a *gross* exaggeration, the 2003 report makes unsubstantiated claims to have detected ETBE in a handful of states at the part per billion level in gasoline-contaminated groundwater and gives no references. There were only 3 reported cases (no evidence provided) of ETBE in groundwater at the part per billion level from hundreds of likely LUST cases in 2002. Moreover, the US EPA updated its UST standards in 2009 (requiring double hulled tanks with leak detection) and gave states until 2015 to comply. According to EPA, all states have now complied. So the likelihood of any soil or groundwater contamination from LUSTs by ETBE today is virtually non-existent.

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Literature Search Strategy and Evidence Tables

Thanks to EPA for addressing some of our comments submitted on the 2013 ETBE Preliminary Materials, however a number of issues we had identified remain in the draft ETBE assessment:

- Literature Search Strategy
 - Lack of consistent reporting of negative data was only partially addressed.
 - Recommended use of up-to-date ECHA data base was not incorporated.
 - Still not clear how additional resources were reviewed and used in the assessment.
 - Further clarity was not provided in the selection process of citations as primary source versus ones used for additional information sources.
 - Requested worksheet for details on inclusion and exclusion of selected references was not provided (please show your work).

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Literature Search Strategy and Evidence Tables

- Evidence Tables
 - Clarification is needed on what determined the endpoints and grouping of endpoints selected for inclusion in evidence tables and exposure-response arrays.
 - The scoring of studies for strengths and limitations was only generally described by criteria and methods but the specific assignments were not transparent.
 - The study data is inconsistently expressed and explained. Results are provided as both percent change or incidence depending on the data. There is no clarification when and if the data extracted was transcribed. There was no change in how the evidence tables represented the data with respect to change vs. difference. Details in evidence tables to indicate directional change of data was not completed.