



National Tribal Toxics Council

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January 14, 2019

Stanley Barone, Jr., MS, PhD
Acting Director
US EPA Office of Science Coordination and Policy (7201M)
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Comments on the Experts Nominated To Be Considered for Ad Hoc Participation and Possible Membership on the TSCA Science Advisory Committee on Chemicals (SACC), Docket Number: EPA-HQ-OPPT-2018-0605-0002

Dear Dr. Barone,

We appreciate the opportunity to comment on the nominations for the Science Advisory Committee on Chemicals (SACC) established pursuant to the Frank R. Lautenberg Chemical Safety for the 21st Century Act, the Toxic Substances Control Act, as amended (TSCA). As you know, the National Tribal Toxics Council (NTTC, or Council) is an EPA Tribal Partnership Group (TPG) supported by the EPA Office of Pollution Prevention and Toxics. The Council is focused on providing Tribes with an opportunity for greater input on issues related to toxic chemicals and pollution prevention.

The Council is acutely interested in the SACC and its future work to provide "independent scientific advice and recommendations to the EPA on the scientific and technical aspects of risk assessments, methodologies, and pollution prevention measures and approaches for chemicals regulated under TSCA" (Federal Register Notice). The SACC's purpose aligns closely with the mission of the NTTC which is to advance policies and programs for pollution prevention and toxics management, consistent with the needs, interests, and unique legal status of American Indian tribes, Alaska Natives, and Native Hawaiians. As such, the NTTC observes and participates in EPA's work regarding chemical risk assessments, exposure scenarios, chemical safety, and other environmental health and toxics work related to the Toxic Substances Control Act (TSCA) and the Pollution Prevention Act.

Among the Council's priorities are the protection of tribal water resources, traditional subsistence foods, and tribal lifeways. We work to address adverse health outcomes to tribal members and to tribal resources from disproportionate exposure to toxic chemicals, and to influence policy change by advocating for tribal perspectives in decision making. We support tribal environmental health initiatives by providing resources and education to help implement effective pollution prevention and chemical management programs.

Reviewing the biosketches of 26 permanent SACC members, NTTC appreciates EPA's choices of those whose expertise include risk assessments of environmental contaminants,

susceptible subpopulations including children, susceptibility to chemical exposures, ecological risk assessments, cumulative risk assessments, research on “persistent, bioaccumulative, and toxic chemicals” (PBTs), environmental chemistry and transport, aggregate exposure assessments, life cycle (of chemicals) assessments, exposures related to waste management and consumer products, exposures to endocrine-disrupting chemicals and chemical mixtures, systems toxicology, adverse outcome pathways, and specific experience with trichloroethylene and 1-bromopropane.

The Council recognizes that EPA considered specific criteria and disciplines when selecting the 50 nominees for ad hoc participation. The NTTC’s review of the nominees focused on overall experience in the key sciences and methodologies where there seems to be a gap among the permanent members, and especially human health and ecological risk assessment and toxicology in relation to potentially more exposed subpopulations and susceptible life stages, and how a nominee’s work might better inform the SACC of the unique exposures and risk that tribes face as susceptible subpopulations.

The NTTC supports the following nominees for appointment as SACC ad hoc members whom may also be selected as members of the SACC when a vacancy occurs. Each has a key expertise(s) that are particularly applicable or beneficial for evaluating exposure risks to tribal populations as potentially exposed and susceptible subpopulations as defined by TSCA, as amended (2016).

Serap Erdahl, PhD: Expertise includes multi-media human exposure and risk assessment for cancer and non-cancer effects; multimedia (air, water, soil, sediment, fish) exposure and health risk assessment; fine and nanoparticle exposure and risk assessment; persistent organic chemicals (PAHs, PCBs, PBDEs, Dioxins, Furans) and lead and other toxic metal exposure assessment; invited peer reviewer by EPA for the revised guidance on the Integrated Exposure Uptake Biokinetic Model for Lead in Children in 2012.

Katherine L. Fallace, MPH, CPH: Expertise in susceptible subpopulations; human health risk assessment; toxicology; an Associate of Schools and Programs of Public Health Fellow hosted by the EPA Office Children’s Health Protection focused on creating materials to facilitate the use of risk assessment approaches that appropriately consider children’s health issues as well as the prioritization of chemicals that may disproportionately affect children’s health in the risk assessment process under TSCA.

Mary A. Fox, PhD, MPH: Expertise in human health risk assessment; cumulative risk assessment; research experience in quantitative human health risk assessment as part of environmental policy making, particularly approaches to cumulative and chemical mixtures risk assessment; her research has evaluated air toxics, metals and complex mixtures in the context of community environmental health; served on the US EPA Peer Consultation Workshop on Cumulative Risk Assessment of Phthalates.

Kristin H. Hill, MSHSA: Extensive background working with American Indian/Alaska Native organizations and communities; international experience in Poland, Russia, Nicaragua and Haiti; public health issues impacting American Indian/Alaska Native citizens; National Conversations in Chemical Exposures.

Julien Lam, PhD, MHS, MS: Environmental chemical exposures and links to adverse reproductive and developmental health outcomes; Environmental Health Policy and Environmental Toxicology; research with a particular focus on developing and applying analytic methods to issues within epidemiology and risk assessment as it pertains to maternal and fetal exposures to industrial chemicals in the environment; peer-review of several government documents, such as the EPA Issue Paper on Physiological and Behavioral Changes in Pregnant and Lactating Women and Available Exposure Factors (2014); National Toxicology Program (NTP) Office of Health Assessment and Translation (OHAT) Protocol to Evaluate the State of the Science for Transgenerational Inheritance of Health Effects (2015); the World Health Organization (WHO) Air Quality Guideline Development, Process and Methods Proposals (2016).

Aubrey K. Miller, MD, MPH: Expertise in applied epidemiology, environmental health, toxicology, exposure assessments, risk assessments, public health policy, and research involving health impacts of environmental contamination and disasters; research investigations including in-vitro, in-vivo, clinical, and population-based studies; extensive engagement with vulnerable and impacted populations, complex health studies, and risk assessments, to address highly challenging situations and disasters.

Celeste A. Monforton, DrPH, MPH: Expertise in disproportionately exposed populations, other susceptible populations, occupational, consumer, and general exposure assessment, epidemiology; research and advocacy on work-related injuries and illnesses experienced by vulnerable workers, including people of color, women, and those employed in high-hazard industries.

Virginia C. Moser, PhD: Expertise in neurotoxicology research on developmental neurotoxicity and sensitive subpopulations focused on behavioral and neurochemical effects of numerous toxicants ; development and validation of test methods for neurobehavioral toxicity screening; internal committees including FIFRA Scientific Advisory Panel reviews for pesticide cumulative risk assessments; EPA Risk Assessment Forum (2004-2008); Voluntary Children's Chemical Evaluation Program (VCCEP) ethylbenzene peer consultation expert panel (2007); Northern Contaminants Program grant review (2006).

Keeve E. Nachman, PhD, MHS: Expertise in human health risk assessment, toxicology, epidemiology, exposure science, disproportionately exposed populations, systematic review, food safety; research applies a risk sciences lens to food production practices (spanning from veterinary pharmaceutical residues to urban agricultural production) and their implications for occupational, environmental and dietary exposures to inorganic and organic chemicals and microbiological hazards.

Heather B. Patisaul, PhD: Research on endocrine disruption, brain and behavior with a focus on sexually dimorphic neuroendocrine pathways and behaviors; member of Project Targeting Environmental Neuro-Development Risks (TENDR) to identify and reduce environmental neurodevelopmental risks; research interests are mechanisms of endocrine disruption in the developing brain and long-term effects on neuroendocrine function and behavior; panels including the Joint Research Center of the European Commission's Workshop on Bridging Across Methods in the Biosciences (BEAMS, 2018), the organizing committee for the National Academy of Sciences workshop Cultivating Confidence: Understanding Pathways to a Paradigm Shift in Toxicity Testing and Decision Making (2017), and the National Institute of Environmental Health Sciences Strategic Planning Stakeholder Community Workshop (2011), the National Research Council Committee on Incorporating 21st Century Science into Risk-Based Evaluations (2015-2016).

Myles Perkins, PE: Toxics Reduction Supervisor at the Washington State Department of Ecology in the Hazardous Waste and Toxics Reduction Program; expertise in practical application of alternative assessment methodology for safer chemicals and/or processes at businesses currently using hazardous substances; pollution prevention, safer chemical selection, industry process analysis, end of life waste management, green engineering techniques, and resource conservation; evaluate the applicability and feasibility of safer chemical alternatives and identify ways to cost effectively eliminate, reduce or avoid hazardous substances from entering waste streams.

Deborah C. Rice, Ph.D.: Expertise in neurotoxicology, developmental toxicology, environmental contaminants; research into the developmental neurotoxicity of environmental contaminants including lead, methylmercury, and PCBs; senior risk assessor at EPA and toxicologist with the Maine Center for Disease Control; workshops, including Lead Toxicokinetic Modeling Phase 1: Problem Formulation, Existing Model Review and Evaluation, and Feasibility Assessment, Health Canada, Vancouver, British Columbia, 2008; Fate and Bioavailability of Mercury in Aquatic Ecosystems and Effects on Human Exposure, sponsored by Dartmouth College, Durham, New Hampshire, 2006; Neurobehavioral Development and Environmental Exposures: Measures for the National Children's Study, sponsored by EPA and NIH, Washington, DC, 2004;

Exploring Opportunities for Interdisciplinary Linkages in Neurodevelopment and Environmental Health Sciences; Panel Experience, including Reference Values for trichloroethylene (TCE), dichloromethane DCM, and n-methylpyrrolidone NMP, EPA/OPPT, 2014; Toxicological Review and Recommended Toxicological Reference Values for Environmental Lead Exposure in Canada, Health Canada, 2008; Risks and Benefits of Marine Seafood, Harvard School of Public Health, Boston, MA, 2008; State Alternatives Assessment Forum: Identifying Safer Alternatives to Chemicals of High Concern, Toxics Use Reduction Institute, Lowell, MA, 2008; Chair, external peer review panel of Toxicological Assessment of Polybrominated Diphenyl Ethers, EPA, Washington, D.C., 2007; State of Maine Governor's Task Force on Safer Chemicals in Consumer Products and Services, 2006-2007.

Veena I. Singla, PhD: Associate Director, Science & Policy, University of California San Francisco Program on Reproductive Health and the Environment, San Francisco, California; expertise in reproductive and developmental toxicity, flame retardant chemicals, biological susceptibility, chemical exposures in indoor environments; informing policies with the most current scientific principles and data to reduce and prevent harmful environmental exposures; research focuses on indoor environmental quality and how exposure to multiple chemicals affects health outcomes, especially for vulnerable populations such as workers, pregnant women and young children.

Marissa N. Smith, MS, Ph.D. Candidate: Expertise: Toxicology, children's health, risk assessment; worked with the University of Washington Child Environmental Health Risks Research, Predictive Toxicology Center, Center for Oceans and Human Health and the Pacific Northwest Center for the National Children's Study; currently a research coordinator for the Children's Health Exposure Analysis Resource; research interests include toxic chemicals and alternatives in children's consumer products, agricultural exposures in rural communities, environmental microbiome analysis and predictive toxicology tools; graduate research focuses on prioritizing toxic chemicals for children's health and is funded by the EPA STAR fellowship program (2016-2019); co-developed and participated in workshops, such as Children' Health Matters (2013) and Fish and Future (2018).

Katherine von Stackelberg, ScD: Expertise in human health and ecological risk assessment, decision analysis, exposure modeling, risk communication, research translation, systematic review; designing and implementing human health and ecological risk assessments, focused on integrated, risk-based approaches to support sustainable environmental decision making; works on emerging methods in risk analysis, use of decision analytic methods and tools, exposure modeling, ecosystem services, and research translation; works on emerging methods in risk analysis, use of decision analytic methods and tools, exposure modeling, ecosystem services, and research translation; invited reviewer grants and documents including EPA Science to Achieve Results (STAR) grant program related to "Total Environment" (2017), EPA EcoService Models Library (ESML) online database of ecosystem service models (2015), US Department of Agriculture, Agriculture and Food Research Initiative Competitive Grant Program, Water for Agriculture Challenge Area (2015), EPA reports related to ecosystem services (2015), expert to review an Industrial Research Chair (IRC) in Risk Science renewal application on behalf of the Natural Sciences and Engineering Research Council of Canada (2015), an assessment of Puget Sound management alternatives (2014-2015), A Framework to Guide Selection of Chemical Alternatives for the National Research Council's Board on Chemical Sciences and Toxicology (2014-2015).

Calvin C. Willhite: Expertise in toxicology and publishes primarily in developmental toxicology; retired from the State of California Department of Toxic Substances Control where he conducted human health risk assessments for hazardous waste (1985-2011). Served on EPA's Integrated Risk Information System (IRIS) Hexachlorobutadiene Panel (2002); National Toxicology Program Center for the Evaluation of Risks to Human Reproduction (NTP/CERHR) Bromopropane Review Panel (2001); International Life Sciences Institute's

Reproductive and Developmental Toxicity Risk Science Panel (2002-2005): EPA's National Advisory Committee on Acute Exposure Guideline Levels (AEGs) (2006-2009); and National Academy of Sciences Committee on Toxicology (2001-2004). Panel experience includes National Toxicology Program Level of Concern (LoC) Panel (2017); Environment and Climate Change Canada/Health Canada Screening Assessment International, Classified Substance Grouping Ethanol (2016); Environment Canada, Health Canada Draft Screening Assessment, Petroleum Sector Stream Approach, Natural Gas Condensates (2016); EPA Review Panel TSCA Workplan Chemical Risk Assessment Trichloroethylene (2013).

Tracey J. Woodruff, PhD, MPH: Professor and Director of the Program on Reproductive Health and the Environment, Department of Obstetrics, Gynecology, and Reproductive Sciences, University of California, San Francisco (UCSF); expertise in Epidemiology; Environmental Health; Exposure Assessment; Exposure Analysis; Risk Assessment; Systematic Reviews; Perinatal and Child Health; environmental epidemiology, exposure analysis, risk assessment, and systematic reviews of environmental chemicals and related health effects, with expertise on exposures during pregnancy and effects on prenatal and child health; the Science Advisory Board of the Developmental and Reproductive Toxicant (DART) Identification Committee (2012-present); previously EPA senior scientist and policy advisor in the Office of Policy; the Advisory Board for Environmental Health Perspectives (2007-present); National Academy of Sciences 2013 committee to review "U.S. EPA's draft paper State of the Science on Nonmonotonic Dose Response."

Ami R. Zota, ScD, MS: Expertise in environmental chemical exposure assessment; reproductive and perinatal epidemiology; environmental health disparities; molecular epidemiology; recognized as a Pioneer under 40 in Environmental Public Health by the Collaborative on Health and the Environment in 2017; research specializes in exposure biology in the context of women's health, using a highly multi-disciplinary approach that integrates exposure sciences, epidemiology, social determinants of health, and molecular biology; Peer Reviewer for research solicitations for US EPA National Priorities: Per- and Polyfluorinated Substances (2018).

The NTTC works for creating and maintaining a cooperative exchange of information between tribes, federal partners, and other organizations that represent tribal interests in chemical risk management and pollution prevention initiatives that impact tribal lifeways. We look forward to actively partnering with the SACC and following the work they produce regarding chemicals regulated under TSCA and in the interest of health and well-being of tribes.

We look forward to the Agency's written response to these comments. Should you or your staff have questions or comments regarding our letter, please contact myself, Dianne Barton, NTTC Chair, at (503) 731-1259 / bard@critfc.org or Fred Corey, NTTC Vice-Chair, at (207) 764-7765 / fcory@micmac-nsn.gov.

Sincerely,



Dianne C. Barton, Chair
National Tribal Toxics Council

CC: Irina Myers, EPA Office of Pollution Prevention and Toxics