# TCEQ LogoNational Comments

# Executive Review Summary

**TCEQ Proposed Comments On:**

On January 19, 2017, the United States Environmental Protection Agency (EPA) published a Federal Register notice (82 FR 6546) of a public comment period (ending March 6, 2017) for the “Request for Nominations for Peer Reviewers and for Public Comment on Peer Review Materials to Inform the Derivation of a Water Concentration Value for Lead in Drinking Water.” Among the peer review materials released for public comment was the January 2017 draft report entitled, “Proposed Modeling Approaches for a Health-Based Benchmark for Lead in Drinking Water.”

**Overview of Proposal:**

The draft report provides several possible approaches for deriving lead drinking water values corresponding to “health-based benchmarks” for public comment.

**Summary of Comments:**

* The EPA inappropriately terms its derived household action levels “health-based benchmarks,” thereby unnecessarily confusing the public. The EPA should revise this terminology to accurately depict the derivation and intended use of the value, or provide the necessary documentation to justify a health-based benchmark in a separate document that is available for public and peer review.
* Of the options presented in the draft report, the TCEQ recommends that the EPA use the 37/72 µg/g (ppm) geometric mean background soil/dust lead concentrations to satisfy the EPA’s National Drinking Water Advisory Council’s request.
* The EPA should revise its soil ingestion, soil/dust concentration, and outdoor air input parameters, as they currently include higher-end exposures.
* Given the complexity of the issue and supporting documentation, the EPA should have provided more than 45 days for the public to comment on this draft.
* EPA should carefully consider and respond to public comments.

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**Deadline**: March 6, 2017