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July 9, 2020

U.S. Environmental Protection Agency
EPA Docket Center (ORD), Mail Code 28221T
1200 Pennsylvania Ave NW
Washington, DC 20460

via Regulations.gov

RE: Docket ID No. EPA-HQ-ORD-2018-0655; FRL-10010-28-ORD
Availability of the Systematic Review Protocol for the Methylmercury Integrated Risk
Information System (IRIS) Assessment

Dear US Environmental Protection Agency,

The Kentucky Division of Water (the Division) appreciates the opportunity to comment on the proposed Availability of the Systematic Review Protocol for the Methylmercury Integrated Risk Information System (IRIS) Assessment.

After careful review, the Division agrees that the proposed protocol follows established guidance documents for obtaining and determining usefulness of new studies and data modeling to determine point of departure and reference doses.

Additionally, the Division supports 1/ reassessment of developmental neurotoxicity outcomes following oral exposure to methylmercury as Module 1; 2/ a second module of assessment for cardiovascular endpoints, and consideration for the need for other endpoint assessment; and 3/ the consideration of confounding factors during the assessment.

Finally, the Division supports the comments submitted by the medical experts of the Emmett Environmental Law & Policy Clinic, and urges the EPA to incorporate their suggestions into this review.

Again, the Division appreciates the opportunity to comment on this matter. Please feel free to contact me at (502) 782-4505, or Paul.Miller@ky.gov, should you have any questions or if the Division can provide further information.

Sincerely,

Paul Miller, P.E.

Paul Miller, P.E., Director
Kentucky Division of Water

JPM/cjc