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Major

1. Other Federal agencies' positions are not only plausible, they are indistinguishable on the basis for scientific merit from the position taken by EPA.
2. I do not recall a case being made for use of the LMS for nongenotoxic mechanisms. I thought I heard evidence to the contrary.
3. The Administrator might ask: "Why is the European approach inappropriate?" Answer: ??

Corporal

1. We say that MVK estimates a risk specific dose of .1 pg/kg-d (10^{-6}) and characterize it as 2 orders of magnitude greater than .006 pg/kg-d.
2. The notion that the respiratory tumors may be related to feed dust is lost. As is the notion that the liver tumor response is 90% of the story.
3. The reader could infer that Pitot that 2,3,7,8-TCDD did not have a threshold when he referred to the "potency" of 2,3,7,8-TCDD, and hence that use of the LMS is appropriate. This may be an implication that we should correct.
4. Some folks are talking about human half lives on the order of 15-30 years.