



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP - 4 2014

Karl S. Bourdeau  
Beveridge & Diamond PC  
1350 I Street, N.W., Suite 700  
Washington, DC 20005-3311

Dear Mr. Bourdeau:

This is in response to your February 26, 2014, letter styled as a Request for Correction<sup>1</sup> under the *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency* (Information Quality Guidelines).<sup>2</sup> In your February 26, 2014 letter, you cite concerns about the objectivity and utility of the External Review Draft of the "Toxicological Review of Libby Amphibole Asbestos In Support of Summary Information on the Integrated Risk Information System (IRIS)" (ERD Assessment).<sup>3</sup>

As you may be aware, the ERD Assessment is a draft document. On its cover, the ERD Assessment clearly states:

This document is an **External Review draft**. This information is distributed solely for the purpose of predissemination peer review under applicable information quality guidelines. It has not been formally disseminated by EPA. It does not represent and should not be construed to represent any Agency determination or policy. It is being circulated for review of its technical accuracy and science policy implications.<sup>4</sup>

---

<sup>1</sup> RFC 14002, February 2014 <http://epa.gov/quality/informationguidelines/documents/14002.pdf>

<sup>2</sup> *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency*, EPA, 2002. (67 FR 63657).

<sup>3</sup> [http://cfpub.epa.gov/ncea/iris\\_drafts/recordisplay.cfm?deid=235092](http://cfpub.epa.gov/ncea/iris_drafts/recordisplay.cfm?deid=235092)

<sup>4</sup> The ERD Assessment also contains a disclaimer stating:

*This document is a preliminary draft for review purposes only. This document is distributed solely for the purpose of predissemination peer review under applicable information quality guidelines. It has not been formally disseminated by EPA. It does not represent and should not be construed to represent any Agency determination or policy. Mention of trade names or commercial products does not constitute endorsement or recommendation for use.*

In addition, the footer of each page of the ERD states: "This document is a draft for review purposes only and does not constitute Agency policy."

This disclaimer is consistent with the requirements of the Office of Management and Budget's Peer Review Bulletin<sup>5</sup>. As part of the IRIS assessment development process,<sup>6</sup> EPA requested public comment on the ERD Assessment and conducted an external peer review of the scientific basis supporting the human health hazard and dose-response assessment of Libby Amphibole Asbestos in the ERD Assessment. Thus, EPA considers the release of the ERD Assessment to be a part of pre-dissemination review consistent with EPA's Peer Review Handbook<sup>7</sup>.

Although the public comment period has closed, the ERD Assessment is still undergoing review by EPA. EPA intends to treat your letter, along with other public comments EPA received, as comments received on the ERD Assessment. EPA is carefully weighing all of the comments EPA has received, will carefully consider the report from the Scientific Advisory Board, and will also consider the comments you raised before finalizing the Toxicological Review of Libby Amphibole Asbestos (final Assessment). To avoid duplicate actions that would interfere with the process of responding to comments and completing final reviews, EPA will not use the Request for Correction process to respond to your letter. However, we will address your comments in a manner consistent with the IRIS process and the Information Quality Guidelines at the time the final Assessment is disseminated in EPA's Response to Public Comments document.

If you do not believe your comments regarding information quality are addressed in the final Assessment once it has been disseminated, you may submit an RFC with respect to the final Assessment. If you choose to submit an RFC on the final Assessment, please send your written request to the EPA IQG Staff via mail (Information Quality Guidelines Processing Staff, Mail Code 2811A, U.S. EPA, 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460); electronic mail ([quality@epa.gov](mailto:quality@epa.gov)); or fax (202-566-2104). Additional information about how to submit a RFC can be found on the EPA IQG website ([www.epa.gov/quality/informationguidelines](http://www.epa.gov/quality/informationguidelines)).

Sincerely,



Monica Jones, Director  
Quality Staff  
Office of Environmental Information

---

<sup>5</sup> OMB's Final Information Quality Bulletin for Peer Review, dated Dec. 16, 2004, available at <http://www.whitehouse.gov/sites/default/files/omb/assets/omb/memoranda/fy2005/m05-03.pdf>, at p. 9 states: "In the context of this Bulletin, the definition of "dissemination" modifies the definition in OMB's government-wide information quality guidelines to address the need for peer review prior to official dissemination of the information product. Accordingly, under this Bulletin, "dissemination" also excludes information distributed for peer review in compliance with this Bulletin ... provided that the distributing agency includes an appropriate and clear disclaimer on the information...."

<sup>6</sup> <http://www.epa.gov/iris/process.htm>

<sup>7</sup> *Peer Review Handbook*, 3d. ed., available at [http://www.epa.gov/peerreview/pdfs/peer\\_review\\_handbook\\_2006.pdf](http://www.epa.gov/peerreview/pdfs/peer_review_handbook_2006.pdf), at p. 18 states: "Products that are undergoing peer review are not considered to be disseminated under EPA's Information Quality Guidelines because they are dynamic documents that are subject to change and therefore, do not represent EPA's final decision or position."

cc: Kenneth Olden, Director, NCEA, EPA  
Vincent Cogliano, Director, IRIS Program, NCEA, EPA  
David Bussard; Director, Washington Division, NCEA, EPA  
Pamela D. Marks, Beveridge & Diamond PC