



August 28, 2018

Director Rick Keigwin
Office of Pesticide Programs
Environmental Protection Agency
2777 South Crystal Drive
Arlington, VA 22202

Information Quality Guidelines Staff (Mail Code 28 11 R)
U.S. EPA
1200 Pennsylvania Ave., NW
Washington, DC 20460
quality@epa.gov

Re: Demand for Correction under Information Quality Act: “EPA’s Seven Year Quest for Columbia’s Raw Data”

Director Keigwin, Information Quality Officer,

The Center for Biological Diversity (the “Center”) hereby submits this Request for Correction under the Information Quality Act (IQA) of 2000,¹ the Office of Management and Budget (OMB) *Guidelines for Ensuring and Maximizing the Quality, Utility, and Integrity of Information disseminated by Federal Agencies*, and the Environmental Protection Agency's (EPA) Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency.

On or around August 27, 2018, the Environmental Protection Agency Office of Pesticide Programs posted a new page to its website entitled “EPA’s Seven Year Quest for Columbia’s Raw Data.”² This website fails to comply with the IQA’s basic requirements that all federal agencies provide public information that is objective, of adequate quality, utility, and high integrity.

EPA claims on this webpage that it has engaged in a quest — defined as “an act or instance of seeking: pursuit, search, chivalrous enterprise in medieval romance usually involving an adventurous journey of information”³ — to obtain raw data regarding a study completed by Columbia University “since 2010.”

EPA has not provided any information to the public supporting this claim of a “quest” since 2010, but rather has posted just three letters all sent in a two year period of time where EPA and Columbia University have worked on addressing valid, legal concerns regarding what information can be reviewed by EPA and/or released to the public.

¹ Section 515 of the FY 2001 Treasury and General Government Appropriations Act, Pub. L. No. 106-554.

² <https://www.epa.gov/ingredients-used-pesticide-products/chlorpyrifos-epas-seven-year-quest-columbias-raw-data>

³ https://www.merriam-webster.com/dictionary/quest?utm_campaign=sd&utm_medium=serp&utm_source=jsonld

Indeed a search of the regulatory docket for Chlorpyrifos does not result in ANY documents posted to the docket in the calendar year 2010 in the “Supporting documents” category,⁴ nor does a search of the docket for “Columbia” and “letter” reveal any information that demonstrates that EPA has been engaging in a “Quest” for information.⁵

EPA has posted to its website a highly ideological, biased and unsubstantiated piece of propaganda in order to benefit Dow Chemical, Croplife America and the other special interests it now fully obeys. This propaganda is a clear violation of the Information Quality Act, is virtually unprecedented in its unprofessional tone, and is beneath the dignity of the Agency.

The Center requests that this webpage be removed immediately and hopes that it will be referred to the Inspector General for further review.

Thank you,



Brett Hartl
Government Affairs Director
Center for Biological Diversity

⁴ See Attachments.

⁵ See Attachments.

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Registration Review of Chlorpyrifos (PC Code 059101)

Docket Browser [Return to Docket Folder Summary](#)

Docket ID: EPA-HQ-OPP-2008-0850 Agency: Environmental Protection Agency (EPA)

Summary:

For further information contact: Don Fredman (703-347-8827) Mail code 7508P

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6/27/11. Chlorpyrifos: Tier II Incident Report

Documents Contents: ...children's healthy populations (Columbia University, Mount Sinai Hospital, and... analysis of risks to people. Toxicology Letters, 159, 235-251. BLONDELL, J...

Supporting & Related Material | Posted: 07/06/2011

ID: EPA-HQ-OPP-2008-0850-0032

[Comments Not Accepted](#)

EPA Letter to Columbia Mailman School of Public Health

Documents Contents: ...New York, NY 10032 Re: Columbia Center for Children's Environmental Health...

[Comments Not Accepted](#)

Accordingly, please consider this e-mail form a request for his...

Supporting & Related Material | Posted: 05/31/2016 | ID: EPA-HQ-OPP-2008-0850-0871

Chlorpyrifos: Revised Human Health Risk Assessment for Registration Review

Documents: ...BMD Modeling 383 Appendix 6. Comb Center for Children's Environmental Health and Disease (PBPK/PD) model. Toxicology Letters. 135, 51. Tomchick, C., et al.

Supporting & Related Material | Posted: 12/31/2014 | ID: EPA-HQ-OPP-2008-0850-0195

Comments No Accepted

Response to the Petition by AMVAC to Postpone Chlorpyrifos SAP Meeting

Documents: ... regarding the peer reviewed research. Your efforts suggest that the EPA's consideration of the Comb Center's absence of access...

Supporting & Related Material | Posted: 05/31/2016 | ID: EPA-HQ-OPP-2008-0850-0870

Comments No Accepted

Chlorpyrifos Dataset Discussion: Columbia Center for Children's Environmental Health Mothers and Newborns Study August 1, 2016, Teleconference

Documents: Chlorpyrifos Dataset Discussion: Comb Center for Children's Environmental Health Mothers... discussion, there were three e-mails exchanged between Dr. Linda Fried...

Supporting & Related Material | Posted: 09/14/2016 | ID: EPA-HQ-OPP-2008-0850-0930

Comments No Accepted

Letter from Jack E. Housenger, Director, Office of Pesticide Programs to Dr. Linda P. Fried, Dean, Mailman School of Public Health, Columbia University, dated June 27, 2016

Documents: ... secret enclosure Comb Center, which I believe does not resolve the transparency issues in my previous e-mail. EPA understands your concern for...

Supporting & Related Material | Posted: 08/09/2016 | ID: EPA-HQ-OPP-2008-0850-0927

Comments No Accepted

Letter from Linda P. Fried, Dean, Mailman School of Public Health, Columbia University, to Jack E. Housenger, Director, Office of Pesticide Programs, United States Environmental Protection Agency, dated May 18, 2016

Documents: ...Protection Agency Re: Comb Center for Children's Environmental Health Epidemiology Study Director Mr. Housenger, Thank you for your e-mail of April 19, 2016...

Comments No Accepted

Supporting & Related Material | Posted: 08/09/2016 |

ID: EPA-HQ-OPP-2008-0850-0928

Federal Letter-Review of Chlorpyrifos

Epidemiology Studies

Doc men Con en s : ...D.C. 20460 RE: Feder Le er-
Rev ew of Ch orpyr fos Ep dem i ogy

S d es...prod ced by rese rchers w h he Co mb
Cen er on Ch dren's Env ronmen ...

Supporting & Related Material | Posted: 05/17/2013 |

ID: EPA-HQ-OPP-2008-0850-0170

Comments No Accepted

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Registration Review of Chlorpyrifos (PC Code 059101)

Docket Browser [Return to Docket Folder Summary](#)

Docket ID: EPA-HQ-OPP-2008-0850 Agency: Environmental Protection Agency (EPA)

Summary:

For further information contact: Don Friedman (703-347-8827) Mail code 7508P

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02/07/08, Chlorpyrifos 059101 Screening Level Usage

Analysis (SLUA)

Supporting & Related Material | Posted: 03/18/2009 |

ID: EPA-HQ-OPP-2008-0850-0005

Comments No Accepted

10/15/08, Updated Review of Chlorpyrifos Incidents Reports.

Supporting & Related Material | Posted: 03/18/2009 |

ID: EPA-HQ-OPP-2008-0850-0004

Comments No Accepted

3/12/09, Chlorpyrifos Summary Document

Registration Review: Initial Docket, March 2009

Supporting & Related Material | Posted: 03/18/2009 |

ID: EPA-HQ-OPP-2008-0850-0002

Comments No Accepted

05/16/08, Appendix A: Food/Feed and Non-food/Non-feed Uses Considered in Registration

Supporting & Related Material | Posted: 03/18/2009 |

ID: EPA-HQ-OPP-2008-0850-0006

Comments No Accepted

02/09/09, Chlorpyrifos. Human Health Assessment Scoping Document in Support of Registration Review

Supporting & Related Material | Posted: 03/18/2009 |

ID: EPA-HQ-OPP-2008-0850-0003

Comments No Accepted

11/25/08, Registration Review – Preliminary Problem Formulation for the Ecological Risk and Environmental Fate, Endangered Species, and Drinking Water Assessments for Chlorpyrifos (PC Code 059101; DP Barcode D355212)

Supporting & Related Material | Posted: 05/01/2009 |

ID: EPA-HQ-OPP-2008-0850-0007

Comments No Accepted

6-25-09 Slides from EPA Meeting with Dow AgroSciences

Supporting & Related Material | Posted: 07/23/2009 |

ID: EPA-HQ-OPP-2008-0850-0019

Comments No Accepted

6-25-09 Sign-in Sheet for EPA Meeting with Dow AgroSciences

Supporting & Related Material | Posted: 07/23/2009 |

ID: EPA-HQ-OPP-2008-0850-0018

Comments No Accepted

Chlorpyrifos Final Work Plan (FWP) - 9/25/09

Supporting & Related Material | Posted: 10/06/2009 |

ID: EPA-HQ-OPP-2008-0850-0020

Comments No Accepted

Registration Review – Response to Comments on Preliminary Problem Formulation for Ecological Risk and Environmental Fate, Endangered Species and Drinking Water Assessments for Chlorpyrifos (PC Code 059101; DP Barcode D355212) - 8/5/09

Supporting & Related Material | Posted: 10/06/2009 |

ID: EPA-HQ-OPP-2008-0850-0021

Comments No Accepted

Chlorpyrifos. Health Effects Division Response to Comments on the Registration Review Preliminary Work Plan. - 8/13/09

Comments No Accepted

Supporting & Related Material | Posted: 10/06/2009 |
ID: EPA-HQ-OPP-2008-0850-0022

BEAD Response to Comments on Chlorpyrifos Preliminary Work Plan (DP#366702) - 7/28/09

Supporting & Related Material | Posted: 10/06/2009 |
ID: EPA-HQ-OPP-2008-0850-0023

Comments No Accepted

6/30/11 - Revised Chlorpyrifos Acute and Chronic Dietary Exposure and Risk Assessments

Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0030

Comments No Accepted

5/24/11. Chlorpyrifos. Registration Review Action for Chlorpyrifos. Summary of Analytical Chemistry and Residue Data.

Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0031

Comments No Accepted

6/30/11 - Chlorpyrifos Preliminary Human Health Assessment for Registration Review

Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0025

Comments No Accepted

6/27/11. Chlorpyrifos: Tier II Incident Report

Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0032

Comments No Accepted

6/30/11 - Revised Chlorpyrifos Preliminary Reg Review Drinking Water Assessment

Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0026

Comments No Accepted

7/1/11. Reader's Guide to the Preliminary Human Health Risk Assessment for Chlorpyrifos

Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0027

Comments No Accepted

6/16/11. Chlorpyrifos Carcinogenicity: Review of Evidence from the U.S. Agricultural Health Study (AHS) Epidemiologic Evaluations 2003-2009

Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0029

Comments No Accepted

6/27/11. Chlorpyrifos: Occupational and Residential Exposure Assessment

Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0028

Comments No Accepted

Chlorpyrifos Occupational and Residential Appendix

A

Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0034

Comments No Accepted

Chlorpyrifos Occupational and Residential Appendix

B

Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0035

Comments No Accepted

Chlorpyrifos Occupational and Residential Appendix

F

Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0039

Comments No Accepted

Chlorpyrifos Occupational and Residential Appendix

E

Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0038

Comments No Accepted

Chlorpyrifos Occupational and Residential Appendix

D

Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0037

Comments No Accepted

**Revised Chlorpyrifos Preliminary Reg Review
Drinking Water Assessment - Appendix D - Typical
Use Data for Chlorpyrifos**

Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0033

Comments No Accepted

Chlorpyrifos Occupational and Residential Appendix

H

Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0041

Comments No Accepted

Chlorpyrifos Occupational and Residential Appendix

C

Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0036

Comments No Accepted

Chlorpyrifos Occupational and Residential Appendix

G

Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0040

Comments No Accepted

**2/17/11 - EPA's Chlorpyrifos BMD runs for the
Preliminary Human Health Risk Assessment.**

Comments No Accepted

Supporting & Related Material | Posted: 04/30/2012 |
ID: EPA-HQ-OPP-2008-0850-0102

7/16/12. Spray Drift Mitigation Decision for Chlorpyrifos

Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0103

Comments No Accepted

7/13/12. Chlorpyrifos – Evaluation of the Potential Risks from Spray Drift and the Impact of Potential Risk Reduction Measures

Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0105

Comments No Accepted

7/10/12. Dow AgroSciences – Spray Drift Assessment and Drift Management Labeling Considerations

Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0104

Comments No Accepted

7/13/12. Appendix G - Chlorpyrifos – Evaluation of the Potential Risks from Spray Drift and the Impact of Potential Risk Reduction Measures

Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0108

Comments No Accepted

7/13/12. Appendix F - Chlorpyrifos – Evaluation of the Potential Risks from Spray Drift and the Impact of Potential Risk Reduction Measures

Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0107

Comments No Accepted

7/13/12. Appendix E - Chlorpyrifos – Evaluation of the Potential Risks from Spray Drift and the Impact of Potential Risk Reduction Measures

Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0106

Comments No Accepted

7/11/12 - Evaluation of Columbia University Epidemiology Study Claims Related to Brain Abnormalities and Pre-Natal Exposures to Chlorpyrifos

Supporting & Related Material | Posted: 08/08/2012 |
ID: EPA-HQ-OPP-2008-0850-0110

Comments No Accepted

8/3/12 - Drift Potential of Banded Uses of Chlorpyrifos

Supporting & Related Material | Posted: 08/08/2012 |
ID: EPA-HQ-OPP-2008-0850-0109

Comments No Accepted

Review of Two Environmental Fate Studies for Chlorpyrifos

Comments No Accepted

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0122

**Data Evaluation Record for Chlorpyrifos Air
Photolysis Study MRID 48789701**

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0112

Comments No Accepted

**Data Evaluation Record for Chlorpyrifos Field
Volatility Study - Potato MRID 48998801**

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0120

Comments No Accepted

Attachment 2 PERFUM Modeling Files

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0116

Comments No Accepted

**Chlorpyrifos Volatility Assessment: Guide to
Commenters**

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0117

Comments No Accepted

**Attachment 1 Chlorpyrifos Master Use Summary
Document**

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0115

Comments No Accepted

**Updated Data Evaluation Record for Chlorpyrifos Flux
study MRID 48883201**

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0121

Comments No Accepted

**Information on Application Rates and Acres Treated
per Application per Day for Selected Chlorpyrifos
Formulations**

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0118

Comments No Accepted

**Updated: Evaluation of Direct Flux Measurement of
Chlorpyrifos and Chlorpyrifos-Oxon Emissions
Following Applications of Lorsban Advanced
Insecticide to Alfalfa (MRID 48883201)**

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0119

Comments No Accepted

**Chlorpyrifos Preliminary Evaluation of the Potential
Risks from Volatilization**

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0114

Comments No Accepted

Information Package re Meeting between Dow AgroSciences and EPA to Discuss Chlorpyrifos and Recent Epidemiology Studies, the April 2012 SAP, and Dose Reconstruction

Supporting & Related Material | Posted: 02/06/2013 | ID: EPA-HQ-OPP-2008-0850-0113

Comments Not Accepted

Federal Letter-Review of Chlorpyrifos Epidemiology Studies

Supporting & Related Material | Posted: 05/17/2013 | ID: EPA-HQ-OPP-2008-0850-0170

Comments Not Accepted