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Additional Correspondence Relating to  
RFR Submission for RFC #08002

# Index of Contents

Page #

|   |    |
|---|----|
| 11/12/08 E-mail Acknowledgement to Mr. Camplin from IQG Staff .....   | 3  |
| 11/16/08 Reply from Mr. Camplin to November 12, 2008, Acknowledgement of Related<br>Correspondence Posted to Web site under RFC ..... | 5  |
| 12/20/08 EPA Letter Advising That Revised Report Has Been Released .....  | 8  |
| 11/26/08 Correspondence from Mr. Camplin .....  | 10 |
| 12/4/08 IQG Staff E-mail Response to Mr. Camplin's November 12, 2008, Correspondence  | 13 |
| 12/5/08 Correspondence from Mr. Camplin .....   | 16 |
| 12/9/08 E-mail Acknowledgement of RFR Initiation from IQG Staff .....   | 19 |

11/12/08 E-mail Acknowledgement to Mr. Camplin  
from IQG Staff



Group Quality  
11/12/2008 04:35 PM

Sent by: Kimberlie Orr

To: MUNDYCAMP@aol.com  
cc: quality@epa.gov

Subject: Re: Revised RFR 08002

Dear Mr. Camplin:

Thank you for your communication concerning the April 24, 2008, Request for Correction (RFC) #08002 submitted under the Environmental Protection Agency's Information Quality Guidelines (EPA IQG). Your correspondence, dated November 8, 2008, was received in this office on November 10, 2008.

In EPA's RFC response, we stated the revised "Sampling and Analysis of Asbestos Fibers on Filter Media to Support Exposure Assessments: Bench-Scale Testing" (EPA/260R-02-008) document would be released by November 15, 2008. We believe this revised document will address the information quality concerns raised in your RFC. You will receive formal notification about the release of the revised document. After reviewing the revised document, you may submit an appeal through the Request for Reconsideration provisions of the EPA IQG if you believe your information quality concerns have not been addressed.

In the interim, your correspondence dated November 8, 2008 will be posted on our public EPA IQG Web site as "related correspondence" for RFC #08002.

If you have any questions about this decision, please contact us.

Sincerely,

EPA Information Quality Guidelines Staff

E-mail: [quality@epa.gov](mailto:quality@epa.gov)

Phone: (202) 564-6830

Fax: (202) 565-2441

Mail: Information Quality Guidelines Staff (MC 2811R)

U.S. Environmental Protection Agency

1200 Pennsylvania Ave., N.W.

Washington D.C. 20460-0001

MUNDYCAMP MUNDYCAMP@aol.com on 11/10/2008 11:36:1...

11/10/2008 11:37:20 AM

11/16/08 Reply from Mr. Camplin to November 12, 2008,  
Acknowledgement of Related Correspondence  
Posted to Web site under RFC



MUNDYCAMP@aol.com on 11/16/2008 10:07:10 AM

To: Group Quality@EPA, Group Quality@EPA, Molly O'Neill/DC/USEPA/US@EPA  
cc:

Subject: COMPLAINT: RFR to RFC 80002: COMPLAINT

## COMPLAINT

Dear Ms. O'Neill and Information Quality Office:

**Please immediately correct the error on your Information Quality website and properly acknowledge my RFR as an appeal to your non-response reply to my initial RFC #08002.**

I filed an Information Quality Challenge Request for Reconsideration (RFR) on November 8, 2008 to your non-responsive reply to my Request for Correction (RFC) #08002, dated April 24, 2008. My RFR was inappropriately classified on your website as "related correspondence". This is in violation of your "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency" EPA document 260R-02-008, October 2002. Your office's unorthodox non-response reply to my initial RFC and subsequent intentional ignoring/misclassification of my RFR gives the appearance that the Agency has something to hide or cover-up. It appears that these inappropriate actions have been taken by EPA staff to hastily republish a scientifically flawed document which I still challenge. Please cease this deceptive behavior by your staff. Immediately correct these errors and policy violations by properly citing my November 8, 2008 RFR as an official appeal to your inadequate and non-responsive reply to my RFC #08002.

Your website <http://www.epa.gov/QUALITY/informationguidelines/igg-list.html> inappropriately identifies my RFR as follows:

### **Private Citizen**

**RFC 08002 (PDF 700KB)**

**Subject:** *Sampling and Analysis of Asbestos Fibers on Filter Media to Support Exposure Assessments: Bench-Scale Testing*

- Letter dated 04/24/08; received 04/24/08
- Notification of receipt sent to requestor on 04/24/2008
- EPA Related Correspondence (PDF 88KB); 07/17/2008
- EPA Interim Response to RFC (PDF 94KB); issued 07/23/2008
- EPA Response to RFC (PDF 2.52MB) ; issued 10/03/2008
- EPA Related Correspondence (PDF 890KB); 11/08/2008 <----- **THIS IS MY RFR APPEAL!**

**The last line listed above incorrectly identifies my official appeal and RFR to your non-responsive reply to my RFC 08002 as "EPA Related Correspondence". Yet all RFR's submitted by organizations on other challenges listed on your webpage correctly post them as RFR's. Please revise your webpage and properly cite my RFR as an official appeal.**

The information quality guidelines list procedures for the EPA to properly process a RFR. Your office has not complied with the tracking requirements for RFR's in the Office of Environmental Information (OEI) system. I have provided these procedures for your information:

[http://www.epa.gov/QUALITY/informationguidelines/documents/EPA\\_InfoQualityGuidelines.pdf](http://www.epa.gov/QUALITY/informationguidelines/documents/EPA_InfoQualityGuidelines.pdf)

### **8.7 How Does EPA Intend to Process Requests for Reconsideration of EPA Decisions?**

EPA intends to consider RFR using the following process:

- **Each RFR will be tracked in an OEI system.**
  - OEI sends the RFR to the appropriate EPA Program Office or Region that has responsibility for the information in question.
  - The Assistant Administrator (AA) or Regional Administrator (RA) information owner presents to an executive panel. The executive panel would be comprised of the Science Advisor/AA for the Office of Research and Development (ORD), Chief Information Officer/AA for OEI, and the Economics Advisor/AA for the Office of Policy, Economics and Innovation (OPEI.). The 3-member executive panel would be chaired by the Chief Information Officer/AA for OEI. When the subject of the RFR originated from a member office, that panel member would be replaced by an alternate AA or RA. While the executive panel is considering an RFR, the decision made on the initial complaint by the information owner office or region remains in effect.
  - The executive panel makes the final decision on the RFR.
  - EPA's goal is to respond to each RFR within 90 days of receipt, by 1) providing either a decision on the request or 2) if the request requires more than 90 calendar days to resolve, informing the complainant that more time is required and indicate the reason why and an estimated decision date.
  - If a request is approved, EPA determines what type of corrective action is appropriate. Considerations relevant to the determination of appropriate corrective action include the nature and timeliness of the information involved and such factors as the significance of the error on the use of the information and the magnitude of the error. For requests involving information from outside sources, considerations may include coordinating with the source, and other practical limitations on EPA's ability to take corrective action.
  - Whether or not EPA determines that corrective action is appropriate, EPA provides notice of its decision to the requester.
  - For approved requests, EPA assigns a steward for the correction who marks the information as designated for corrections as appropriate, establishes a schedule for correction, and reports correction resolution to both the tracking system and to the requestor.
- Administrative

**I expect that your staffs intentional misclassification of my RFR as *EPA related correspondence* will be corrected immediately. I would also like an official response from your office detailing how this intentional policy violation occurred and what steps were taken by your office to discipline those responsible. I look forward to your proper and official review of my initial RFC and subsequent RFR following the guidelines referenced above.**

Cordially,

**Jeff Camplin**

-----  
 Jeffery C. Camplin, CSP, CPEA  
 Cell: 1-708-284-4563  
 -----

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**12/20/08 EPA Letter Advising That  
Revised Report Has Been Released**





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NATIONAL EXPOSURE RESEARCH LABORATORY  
RESEARCH TRIANGLE PARK, NC 27711

November 20, 2008

OFFICE OF  
RESEARCH AND DEVELOPMENT

Jeffery C. Camplin  
1681 Verde Lane  
Mundelein, IL 60060

Re: Response to Request for Correction regarding EPA Report No. EPA/600/R-08/046

Dear Mr. Camplin:

As mentioned in my recent letter to you, I am enclosing the revised EPA Report No. EPA/600/R-08/046. "Sampling and Analysis of Asbestos Fibers on Filter Media to Support Exposure Assessments: Bench-Scale Testing." A number of the changes made were in response to your RFC 08002, dated April 24, 2008, under the Environmental Protection Agency (EPA) *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency*.

Please be assured that if you are dissatisfied with our responses, you may submit a Request for Reconsideration (RFR). The U.S. EPA recommends that this request be submitted within 90 days of the notification date for the revised document. To do so, send a written request to the EPA Information Quality Guidelines Processing Staff via mail (Information Quality Guidelines Staff, Mail Code 2811R, U.S. EPA, 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460), electronic mail ([quality@epa.gov](mailto:quality@epa.gov)), or fax (202-565-2441). The RFR should reference the request number assigned to the original request for correction (RFC # 08002). Additional information that should be included in the request is listed on the EPA Information Quality Guidelines web site ([www.epa.gov/quality/informationguidelines](http://www.epa.gov/quality/informationguidelines)).

Please contact Monica Jones at (202) 564-1641, should you have any questions about our response.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Lawrence W. Reiter".

Lawrence W. Reiter, Ph.D.  
Director (D305-01)

Enclosure

**11/26/08 Correspondence from Mr. Camplin**



MUNDYCAMP@aol.com on 11/26/2008 09:31:20 AM

To: Group Quality@EPA, Group Quality@EPA, Molly O'Neill/DC/USEPA/US@EPA  
cc:

Subject: SECOND COMPLAINT ON SAME RFC 08-002 ISSUE

## COMPLAINT #2

Dear Ms. O'Neill and Information Quality Office:

**Please immediately correct the error on your Information Quality website and properly acknowledge my RFR from November 8, 2008 as an appeal to your non-response reply to my initial RFC #08002.**

I filed an Information Quality Challenge Request for Reconsideration (RFR) on November 8, 2008 to your non-responsive reply to my Request for Correction (RFC) #08002, dated April 24, 2008. My RFR was inappropriately classified on your website as "related correspondence". On November 16, 2008 I filed a complaint regarding this matter and asked for this error to be corrected. As of today the error of misclassifying and ignoring my official appeal/RFR has not been addressed. This is in violation of your "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency" EPA document 260R-02-008, October 2002. Your office's unorthodox non-response reply to my initial RFC and subsequent intentional ignoring/misclassification of my RFR gives the appearance that the Agency has something to hide or cover-up. It appears that these inappropriate actions have been taken by EPA staff to hastily republish a scientifically flawed document which I still challenge. Please cease this deceptive behavior by your staff. Immediately correct these errors and policy violations by properly citing my November 8, 2008 RFR as an official appeal to your inadequate and non-responsive reply to my RFC #08002.

Your website <http://www.epa.gov/QUALITY/informationguidelines/iqg-list.html> inappropriately identifies my RFR as follows:

### **Private Citizen**

**RFC 08002 (PDF 700KB)**

**Subject:** *Sampling and Analysis of Asbestos Fibers on Filter Media to Support Exposure Assessments: Bench-Scale Testing*

- Letter dated 04/24/08; received 04/24/08
- Notification of receipt sent to requestor on 04/24/2008
- EPA Related Correspondence (PDF 88KB); 07/17/2008
- EPA Interim Response to RFC (PDF 94KB); issued 07/23/2008
- EPA Response to RFC (PDF 2.52MB) ; issued 10/03/2008
- EPA Related Correspondence (PDF 890KB); 11/08/2008 <----- **THIS IS MY RFR APPEAL!**

**The last line listed above incorrectly identifies my official appeal and RFR to your non-responsive reply to my RFC 08002 as "EPA Related Correspondence". Yet all RFR's submitted by organizations on other challenges listed on your webpage correctly post them as RFR's. Please revise your webpage and properly cite my RFR as an official appeal.**

The information quality guidelines list procedures for the EPA to properly process a RFR. Your office has not complied with the tracking requirements for RFR's in the Office of Environmental Information (OEI) system. I have provided these procedures for your information:

**8.7 How Does EPA Intend to Process Requests for Reconsideration of EPA Decisions?**

EPA intends to consider RFR using the following process:

- **Each RFR will be tracked in an OEI system.**
- OEI sends the RFR to the appropriate EPA Program Office or Region that has responsibility for the information in question.
- The Assistant Administrator (AA) or Regional Administrator (RA) information owner presents to an executive panel. The executive panel would be comprised of the Science Advisor/AA for the Office of Research and Development (ORD), Chief Information Officer/AA for OEI, and the Economics Advisor/AA for the Office of Policy, Economics and Innovation (OPEI.). The 3-member executive panel would be chaired by the Chief Information Officer/AA for OEI. When the subject of the RFR originated from a member office, that panel member would be replaced by an alternate AA or RA. While the executive panel is considering an RFR, the decision made on the initial complaint by the information owner office or region remains in effect.
- The executive panel makes the final decision on the RFR.
- EPA's goal is to respond to each RFR within 90 days of receipt, by 1) providing either a decision on the request or 2) if the request requires more than 90 calendar days to resolve, informing the complainant that more time is required and indicate the reason why and an estimated decision date.
- If a request is approved, EPA determines what type of corrective action is appropriate. Considerations relevant to the determination of appropriate corrective action include the nature and timeliness of the information involved and such factors as the significance of the error on the use of the information and the magnitude of the error. For requests involving information from outside sources, considerations may include coordinating with the source, and other practical limitations on EPA's ability to take corrective action.
- Whether or not EPA determines that corrective action is appropriate, EPA provides notice of its decision to the requester.
- For approved requests, EPA assigns a steward for the correction who marks the information as designated for corrections as appropriate, establishes a schedule for correction, and reports correction resolution to both the tracking system and to the requestor.  
Administrative

**I expect that your staffs intentional misclassification of my RFR as *EPA related correspondence* will be corrected immediately. I would also like an official response from your office detailing how this intentional policy violation occurred and what steps were taken by your office to discipline those responsible. I look forward to your proper and official review of my initial RFC and subsequent RFR following the guidelines referenced above.**

Cordially,

**Jeff Camplin**

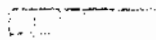
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Jeffery C. Camplin, CSP, CPEA  
Cell: 1-708-284-4563

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**12/4/08 IQG Staff E-mail Response to Mr. Camplin's  
November 12, 2008, Correspondence**



Group Quality  
12/04/2008 01:22 PM

Sent by: Kimberlie Orr

To: MUNDYCAMP@aol.com  
cc: Molly ONeill/DC/USEPA/US@EPA, Reggie Cheatham/DC/USEPA/US@EPA

Subject: Re: SECOND COMPLAINT ON SAME RFC 08-002 ISSUE

Mr. Camplin:

Thank you for your attention to the Agency's process for responding to information quality requests under the EPA Information Quality Guidelines (EPA IQG). We want to assure you that the process used to reply to your Request for Correction (RFC) dated April 4, 2008 is consistent with Section 8.4 of the EPA IQG.

The EPA IQG state the information owner office or region makes a decision on the request on the basis of the information in question. The EPA IQG also state that EPA determines what corrective action is appropriate. If EPA believes a corrective action is warranted, it assigns a steward for the correction, establishes a schedule for correction, and ensures that the corrective action is completed. These were the steps taken following the submission of RFC #08002.

On October 3, 2008, EPA sent a response to your RFC. While EPA does not agree with your assertions that the Sampling and Analysis of Asbestos Fibers on Filter Media to Support Exposure Assessments: Bench Scale Testing" report does not comply with the EPA IQG, EPA nonetheless made revisions to the report to clarify the fact that EPA only studied chrysotile asbestos. The decision to revise the report is the action that EPA determined was appropriate to address your information quality concerns. EPA also assigned a steward who coordinated the completion of the revision and the notification to you that the revision was complete.

On November 8, 2008, EPA received a letter from you asking that EPA provide you with an accurate, timely, and supported response to your information quality challenge. EPA decided to classify this letter as "related correspondence, because the revised report which contains the EPA response to the information quality concerns raised in your RFC (April 24, 2008) and your related correspondence (July 17, 2008) had not been released. A copy of the revised report was sent to you on November 20, 2008.

Since your November 8 submission, EPA has received emails from you on November 10, 16 & 26, 2008 regarding the EPA decision to treat your November 8, 2008 letter as "related correspondence." EPA does not believe it is appropriate to consider a Request for Reconsideration before a requester reviews the full response by the Agency, including any associated document revisions, regarding their Request for Correction. In the EPA response to your RFC and the November 12, 2008 EPA response to your November 10, 2008 email, EPA respectfully requested that you review the revised report to determine whether your information quality concerns have been addressed. Now that you have received a copy of the revised report, EPA will consider a Request for Reconsideration (RFR) for RFC #08002.

If you believe the revised report has not addressed your information quality concerns, you may submit a RFR. The RFR should contain an explanation of why you believe the revisions made to the report have not addressed the information quality concerns found in RFC #08002. Section 8.6 of the EPA IQG states this is the type of information that should be included in a RFR.

If you have any questions, please let us know.

Sincerely,

EPA Information Quality Guidelines Staff  
E-mail: [quality@epa.gov](mailto:quality@epa.gov)

Phone: (202) 564-6830

Fax: (202) 565-2441

Mail: Information Quality Guidelines Staff (MC 2811R)

U.S. Environmental Protection Agency

1200 Pennsylvania Ave., N.W.

Washington D.C. 20460-0001

MUNDYCAMP MUNDYCAMP@aol.com on 11/26/2008 09:31:2...

11/26/2008 09:31:42 AM

12/5/08 Correspondence from Mr. Camplin





MUNDYCAMP@aol.com on 12/05/2008 02:36:43 PM

To: Group Quality@EPA  
cc: Molly O'Neill/DC/USEPA/US@EPA, Reggie Cheatham/DC/USEPA/US@EPA, Marcus Peacock/DC/USEPA/US@EPA

Subject: THIRD COMPLAINT ON SAME RFC 08-002 ISSUE

## Official Complaint #3

Dear Information Quality Guideline staff:

I am in receipt of your email dated December 4, 2008 (copied below). I would like to respond to the inappropriate nature of your correspondence by filing my 3rd Official Complaint regarding your misclassification of my RFR to RFC #08002.

Your refusal to acknowledge my November 8th, 2008 Request for Reconsideration (RFR) is unacceptable and in violation of Section 8.4 of the EPA IQG. Your email claimed that *"EPA does not believe it is appropriate to consider a Request for Reconsideration before a requester reviews the full response by the Agency, including any associated document revisions, regarding their Request for Correction ."* However, the "associated document revisions" you refer to will only **implement** the actions you define in your non-responsive October 3, 2008 reply to my RFC #08002. My RFR clearly states that the corrective actions defined in your October 3, 2008 non-response to the detailed concerns listed in RFC #08002 were unacceptable. I even stated in my RFR that republishing the challenged document with your suggested corrections was also unacceptable.

I properly submitted an RFR on November 8, 2008 to your non-response of my RFC #08002. In my RFR on November 8, 2008, I detailed an explanation of why I believe the non-responsive revisions proposed to the challenged document have not addressed the information quality concerns found in RFC #08002. My RFR meets all of the stated requirements by the EPA IQG. However, your office intentionally misrepresented my RFR as "other correspondence" in violated Section 8.4 of the EPA IQG by improperly requiring me to wait until you actually implemented the unacceptable proposed revisions before I can file an RFR. This is not a requirement of the EPA IQG, and I demand that you properly respond to my RFR of November 8, 2008.

According to your website, to submit a Request for Reconsideration (RFR), I should have already submitted a Request for Correction (RFC) to EPA and received a response to that request. My request should be identified as an RFR by including "Request for Reconsideration" in the subject or title. The request should include the following information:

- RFC number provided in the EPA response
- Date of the original submission of the RFC
- Date of EPA's decision on the RFC
- Name and contact information. Organizations submitting an RFR should identify an individual as a contact
- An explanation of why the person disagrees with the EPA decision, and
- A specific recommendation for corrective action.

I have met all of the requirements for filing an RFR to your non-responsive reply to my RFC#08002. After submitting a RFR you (the Information Quality Office) are required to have an executive panel make EPA's final decision on the request for reconsideration. If my request is approved, EPA would determine what type of corrective action is appropriate. Nearly 30 days have expired on your time to properly convene an executive panel and respond to my RFR to RFC #08002. Please avoid further delay tactics and respond to my properly filed RFR of November 8, 2008. It should be very clear to you by now that I find your non-responsive reply to my RFC #08002 unacceptable for the reasons outlined in my November

8, 2008, RFR. Ignoring my RFR and side stepping my RFC with non-responsive replies demonstrates your inability and/or unwillingness to properly address ALL concerns raised by my RFC #08002.

I will continue to file complaints with the EPA's Inspector General's Office and your superiors asking that your office be compelled to comply with your Information Quality Guidelines. Thank you for your prompt attention to this matter.

Cordially,

Jeff Camplin

---

Jeffery C. Camplin, CSP, CPEA  
Cell: 1-708-284-4563

---

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**12/9/08 E-mail Acknowledgement of RFR Initiation  
from IQG Staff**



Group Quality  
12/09/2008 02:30 PM

Sent by: Kimberlie Orr

To: MUNDYCAMP@aol.com  
cc: Molly ONeill/DC/USEPA/US@EPA, Reggie Cheatham/DC/USEPA/US@EPA

Subject: Re: THIRD COMPLAINT ON SAME RFC 08-002 ISSUE

Mr. Camplin:

The Environmental Protection Agency acknowledges receipt of your December 5, 2008, e-mail. Your letter dated November 8, 2008, will be processed as a Request for Reconsideration (RFR). This letter will be posted on the EPA Information Quality Guidelines as RFR 08002A. EPA will provide a response based on the information provided in this letter. Our goal is to provide this response within 90 days of this e-mail.

Please include the Request Number 08002A in any future related correspondence.

Sincerely,

EPA Information Quality Guidelines Staff  
E-mail: [quality@epa.gov](mailto:quality@epa.gov)  
Phone: (202) 564-6830  
Fax: (202) 565-2441  
Mail: Information Quality Guidelines Staff (MC 2811R)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington D.C. 20460-0001

MUNDYCAMP MUNDYCAMP@aol.com on 12/05/2008 02:36:4...

12/05/2008 02:37:16 PM