UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

DEC 2 0 2019

Mr. Brett Hartl
Government Affairs Director
Center for Biological Diversity
P.O. Box 710
Tucson, Arizona 85702

Dear Mr. Hartl:

This letter is in response to the Request for Correction (RFC) received by the U.S. Environmental Protection Agency (EPA) on August 28, 2018, which was assigned RFC #18002 for tracking purposes. In the RFC letter, the Center for Biological Diversity (CBD) states that the web page "EPA's Seven Year Quest for Columbia's Raw Data[1]" does not comply with the Information Quality Act's "basic requirements that all federal agencies provide public information that is objective, of adequate quality, utility, and high integrity."

Summary of the Request

CBD cites two main issues with the web page:

1. 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" — to obtain raw data regarding a study completed by Columbia University "since 2010."
2. 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.

EPA Response to CBD's Request for Correction

EPA's web page and registration review docket[2] contains the history of EPA's efforts to obtain raw data from Columbia University. EPA and the National Institute of Environmental Health Sciences jointly provided funding to the Columbia Center for Children's Environmental Health (CCCEH) under the 1997 and 2003 Request for Applications which provided funding for five years each. While published reports were available based on data collected during the funding cycle, EPA sought to obtain the original raw data used to support certain epidemiological analysis of *in utero* exposure to chlorpyrifos and subsequent adverse neurodevelopmental health outcomes in children generated by the CCCEH to support the human health risk assessment of chlorpyrifos.

EPA thought these data would be important to verify the results of the study. CCCEH researchers did not agree to provide these data; however, the researchers met with the EPA in

[1] *https://www.epa.gov/ingredients-used-pesticide-products/chlorpyrifos-epas-seven-year-quest-columbias-raw-data.*

[2] *https://www.regulations.gov; see docket ID number: EPA-HQ-OPP-2008-0850.*

2013 and discussed the Agency's questions about the data to help determine whether further review of the raw data might assist the EPA in resolving uncertainties.

A summary of that 2013 meeting with researchers from Columbia University is contained in Appendix 6 (Columbia Center for Children's Environmental Health (CCCEH) Epidemiology Data Acquisition "Raw Data" Request) of EPA's December 2014 human health risk assessment for chlorpyrifos, which can be found in docket ID number: EPA-HQ-OPP-2008-0850-0195 at *https://www.regulations.gov*.[3]

In addition, the web page also contains links to electronic copies of the 2016 – 2018 correspondence with Columbia University, that outlined EPA's continued interest in obtaining the raw data. Although the web page does not reflect the entirety of the multi-year efforts to obtain the raw data, it contains a detailed history of EPA's efforts to obtain the raw data.

Conclusion

The EPA, after careful review of the RFC submitted by CBD, has concluded that our efforts to obtain the raw data from Columbia University have been well-documented. However, the web page can be modified to increase clarity and transparency, and these edits have been made.

Your Right to Appeal

If you are dissatisfied with the response, you may submit a Request for Reconsideration (RFR) as described in EPA's Information Quality Guidelines. The EPA requests that any such RFR be submitted within 90 days of the date of this EPA response. If you choose to submit a RFR, please send a written request to the EPA Information Quality Guidelines Processing Staff via mail (Information Quality Guidelines Processing Staff, Mail Code 2821T, USEPA, 1200 Pennsylvania Avenue, NW, Washington, DC 20460); or electronic mail (*quality@epa.gov*). If you submit a RFR, please reference the case number assigned to this original request (RFC #18002). Additional information about how to submit an RFR is listed on the EPA Information Quality Guidelines website at *http://epa.gov/quality/informationguidelines/index.html*.

Sincerely,

Alexandra Dapolito Dunn, Esq.
Assistant Administrator

cc: Vaughn Noga, Deputy Assistant Administrator for Environmental Information and Chief Information Officer

Vincia Holloman, Director, Enterprise Quality Management Division, Office of Enterprise Information Programs, Office of Mission Support

Richard Keigwin, Director, Office of Pesticide Programs

Angela Hofmann, Director of Regulatory and Information Coordination, Office of Chemical Safety and Pollution Prevention

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[3] Direct url: *https://www.regulations.gov/document?D=EPA-HQ-OPP-2008-0850-0195.*