



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

OFFICE OF MISSION SUPPORT

December 16, 2019

Jim Tozzi  
Center for Regulatory Effectiveness  
1823 Jefferson Place, NW  
Washington, DC 20036

Dear Mr. Tozzi,

Thank you for your submittal on July 16, 2019, of an Information Quality Act (IQA) alert ([RFC #19004](#))<sup>1</sup> concerning EPA's preliminary ecological risk assessment (ERA) for Atrazine. After careful review of both your "IQA Alert" reference and the Agency's review of pesticide registration for atrazine which you cite specifically, EPA declines to consider this request under our Information Quality Guidelines (IQG) administrative review process for the following reasons.

EPA administers its implementation of the Information Quality Act requirements under the *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency* (EPA IQGs). Within our IQGs, although there is no administrative provision for an "IQA Alert" as prelude to a Request for Correction (RFC), the greater reason for declining this request is that there already exists a primary mechanism for public input that is being utilized for public comments for the request that you reference. Our IQGs are not intended to be used as duplicative conduit for public input. Under section 8.3 of EPA's IQGs, EPA may decline an RFC if there are other correction processes the public may use to channel their information quality concerns.

With respect to your stated concerns with the Agency's review of the pesticide registration for Atrazine, it is noted by the Office of Chemical Safety and Pollution Prevention that the pesticide registration for [Atrazine](#) is undergoing reevaluation under the pesticide registration review program. Last July, EPA issued the draft risk assessments for public review and comment<sup>2</sup> and has received over 100,000 public comments, as well as several inquiries related to the registration review status and the level of regulation for aquatic plants. On October 22, 2019, EPA issued a memorandum to the file to articulate EPA's risk management approach for aquatic plant communities and anticipated timeline for completion of registration review for Atrazine.<sup>3</sup> This memorandum provides additional context regarding EPA's proposed regulatory levels for aquatic plants for Atrazine, and memorializes EPA's decision to use the concentration of 15 µg/L as a 60-day average for the purposes of determining the need for any potential mitigation to protect aquatic plant communities during Registration Review.

<sup>1</sup> See [https://www.epa.gov/sites/production/files/2019-10/documents/rfc\\_19004\\_-\\_ecological\\_risk\\_assessment\\_-\\_atrazine.pdf](https://www.epa.gov/sites/production/files/2019-10/documents/rfc_19004_-_ecological_risk_assessment_-_atrazine.pdf)

<sup>2</sup> See [84 FR 35472, July 26, 2018 \(FRL-9980-86\)](#). The comment period was extended and closed on November 23, 2018.

<sup>3</sup> Posted to the docket as document ID No. [EPA-HQ-OPP-2013-0266-1260](#).

We understand that EPA evaluated the Center for Regulatory Effectiveness' comments, which were also provided to EPA during the comment period last year, along with the other comments submitted to EPA. As discussed in the October 22, 2019, memorandum to the file, EPA intends to address the public comments in a response to comment document that will accompany the proposed interim registration review decision for atrazine. EPA intends to publish a Federal Register notice in December 2019, that will announce the availability of the proposed interim registration review decision, with its basis and provide the public with a comment period of at least 60 days.

If you still have concerns over the quality of the information disseminated after the final registration review decision on atrazine is released, please feel free to submit an RFC under EPA's IQGs.

Thank you for your attention to quality.



Sharon Gonder  
Deputy Director, Office of Enterprise Information Programs  
Office of Mission Support  
Environmental Protection Agency