



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 18 2005

OFFICE OF
ENVIRONMENTAL INFORMATION

Mr. Michael Girard
The Perchlorate Study Group
c/o Aerojet
Building 20001, Department 0330
P.O. Box 13222
Sacramento, California 95813-6000

Re: Response to Request for Reconsideration
RFR) on Request for Correction (RFC)
13679 (IQG RFR #13679A)

Dear Mr. Girard:

This letter responds to your December 21, 2004, Request for Reconsideration (RFR #13679A) of the U.S. Environmental Protection Agency's ("EPA" or "Agency") response to your Request for Correction (RFC). In conformance with EPA's Information Quality Guidelines (IQGs), your RFR was decided on by a three-member executive panel comprised of myself, the Acting Associate Administrator for Policy, Economics and Innovation, and the Regional Administrator, EPA Region 3. This letter communicates the EPA's decision on your request.

The panel upholds the determination that the documents and materials cited in your RFC were undergoing peer review and did not represent Agency policy; they were therefore not subject to EPA's IQGs. The panel also concludes that EPA provided sufficient information to assist in accessing the requested materials.

Peer review is one mechanism available to the Agency to ensure and maximize the quality of information disseminated by the Agency. EPA's Peer Review Policy provides that major scientifically and technically based work products (including scientific, engineering, economic, or statistical documents) related to Agency decisions should be peer-reviewed. For those work products that are intended to support the most important decisions or that have special importance in their own right, external peer review is the procedure of choice. While documents are undergoing peer review they do not represent Agency policy and should not be construed as a final Agency determination or policy; therefore are not the intended focus of the IQG correction process. Rather, EPA encourages greater use of external peer review as a means to ensure information quality of the ultimate information dissemination.

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In your RFR, you expressed concern about EPA's 2003 *Disposition of Comments* document. This document was created to help inform the National Academy review. The document provided responses to comments on the 2002 External Review draft, and as such, did not represent final Agency opinion regarding perchlorate science. EPA has incorporated a disclaimer statement in the archived *Disposition* document to help clarify our position regarding this document. The disclaimer states: "This document was provided to the National Academy of Sciences' (NAS) National Research Council (NRC) to assist in its report on the "Health Implications of Perchlorate Ingestion." The document is provided here for archival purposes. The findings in this document have been superseded by the 2005 NRC recommendations and EPA's IRIS summary on perchlorate and perchlorate salts, which represents the Agency's current thinking on this subject. Mention of trade names or commercial products does not constitute endorsement or recommendation." The archived document is available at <http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=72117>.

In January 2005, the National Research Council issued its technical review of the Health Implications of Perchlorate Ingestion.¹ Subsequently, on February 18, 2005, the EPA established an official reference dose for perchlorate of 0.0007 mg/kg/day², which is consistent with the National Academy of Sciences (NAS) recommendation. For more information, please refer to the EPA Integrated Risk Information System (IRIS) summary for perchlorate at <http://www.epa.gov/iris/subst/1007.htm>.

Sincerely,



Kimberly T. Nelson
Assistant Administrator and
Chief Information Officer

¹ Committee to Assess the Health Implications of Perchlorate Ingestion, National Research Council ISBN: 0-309-09568-9, 191 pages, January 2005. <http://www.nap.edu/catalog/11202.html>

² EPA Integrated Risk Information System, Perchlorate and Perchlorate Salts, <http://www.epa.gov/iris/subst/1007.htm>