



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OCT 05 2007

Mr. Seth Goldberg
Steptoe & Johnson, LLP
1330 Connecticut Ave, NW
Washington, D.C. 20036-1795

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

RE: Information Quality Guidelines Request Regarding EPA's Use-Dilution Test Method (RFC #07002)

Dear Mr. Goldberg:

Thank you for your letter dated July 6, 2007, filed under the Environmental Protection Agency Information Quality Guidelines (EPA IQG). In the letter, on behalf of the Efficacy Working Group, you expressed concern about the Agency's use of the Association of Official Analytical Chemists (AOAC) INTERNATIONAL's Use-Dilution Method (UDM) for the bacterium *Pseudomonas aeruginosa*¹. As you know, AOAC is a standard setting organization and the Agency, industry, and other stakeholders have worked closely and will continue to work closely with AOAC to manage, review, and amend the UDM with the goal of enhancing it. This letter responds to your request.

As you know from your participation in the case, the UDM (the subject of your IQG request) is the testing method involved in a pesticide product enforcement action by EPA. Lonza, one of the disinfectant product registrants included in the Efficacy Working Group, is the respondent in an administrative enforcement action. Currently, Lonza and EPA are in settlement discussions. Therefore, because the issues raised in your Request for Correction (RFC) are related to the on-going enforcement litigation, EPA is deferring consideration of your request at this time. If at the conclusion of the litigation, you believe that your data quality concerns have not been addressed, you may ask the Agency to consider your RFC then.

If you choose to ask the Agency to consider your RFC at the conclusion of the litigation, please send your written request to the EPA Information Quality Guidelines Processing Staff via mail (Information Quality Guidelines Processing Staff, Mail Code 2811R, U.S. EPA, 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460); electronic mail (quality@epa.gov); or fax (202-565-2441). Additional information about EPA's Information Quality Guidelines (IQGs) is available at www.epa.gov/quality/informationguidelines.

Sincerely,

James B. Gulliford
Assistant Administrator

¹ AOAC Official Method 964.02, Testing Disinfectants against *Pseudomonas aeruginosa*, Use-Dilution Method, First Action 1964, Revised 2006.