



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 15 2009

Mr. Jeffery C. Camplin  
1681 Verde Lane  
Mundelein, Illinois 60060

OFFICE OF  
ENVIRONMENTAL INFORMATION

Re: Response to Request for Reconsideration (RFR # 08002A) regarding EPA Report No. EPA/600/R-08/046

Dear Mr. Camplin:

This letter is in response to your RFR dated November 8, 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* concerning the EPA Report No. EPA/600/R-08/046, "Sampling and Analysis of Asbestos Fibers on Filter Media to Support Exposure Assessments: Bench-Scale Testing." The RFR requests that EPA reconsider its response to Request for Correction (RFC) #08002.

In the RFC, you requested that EPA correct information contained in that document that you assert could mislead the reader to assume that EPA's analysis included several asbestiform fibers, when in fact we studied only chrysotile asbestos.

Section 8.4 of the EPA Information Quality Guidelines (IQG) states "If a request is approved, EPA determines what corrective action is appropriate." For this RFC, EPA determined to make several changes to the document, described what those changes would be in the RFC reply letter dated October 3, 2008, and notified you on November 20, 2008, that the revised document had been released. The changes made included changing all reported results, including table captions, to specify that the research was conducted on "chrysotile asbestos," and also adding text to the Conclusions and Recommendations section to explain and support the choice of chrysotile asbestos for the study to provide an indication of filter effectiveness for numerous fibers, including amphibole asbestos.

Your RFR asks that the Agency make all changes requested in your RFC, and requests supporting information for statements made in the EPA's October 3, 2008, reply to RFC #08002. The enclosure lists the specific items or actions requested in RFR #08002A.

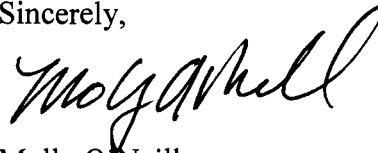
Consistent with EPA's IQG, EPA convened an executive panel to determine the Agency's response to this RFR. The members of the executive panel consisted of the Deputy General Counsel; the Assistant Administrator for Prevention, Pesticides and Toxics; and me, the EPA Chief Information Officer.

The panel members reviewed the RFC, the RFR, and all related correspondence, as well as the changes to the challenged document itself, and have concluded that the changes requested in the RFC were made to the revised document. The explanation for choosing chrysotile asbestos for the study, added in the Conclusions and Recommendations section of the revised document, is clearly written and properly supported by technical references. The Johnson Conference activities were properly described as being separate and distinct from the RFC's challenge to an EPA document.

The panel members agree that the actions taken in response to the RFC were correct and appropriate policy choices for responding to the RFC. Further, the rationale for changes made was adequately documented in the October 3, 2008, letter, and do not require further explanation.

EPA values input from the public on the quality of information it produces and embraces opportunities for improvement. EPA is committed to promoting transparency in our process and providing the public with information that is objective and useful. If you have any questions about our decision on this RFR, please contact Reggie Cheatham at (202) 564-6830.

Sincerely,



Molly O'Neill  
Assistant Administrator  
and Chief Information Officer

cc: Mary Ann Poirier, Deputy General Counsel (2310)  
Jim Gulliford, Assistant Administrator for Prevention, Pesticides and Toxics (7101)  
Lawrence W. Reiter, Director, National Exposure Research Laboratory (8201)  
George Gray, Assistant Administrator, Office of Research and Development (8101)  
Reggie Cheatham, Office of Environmental Information (2811R)

**Specific Requests in November 8, 2008, Request for Reconsideration  
(RFR #08002A)**

1. EPA should support its statement that it “does not agree with RFC assertions that the document at issue does not comply with either the Office of Management and Budget’s or the EPA’s Information Quality Guidelines” or else make all changes requested in the RFC.
2. EPA should provide “evidence” defending the assertion that the EPA document was not so concerned about capture of fibers as about counting efficiency or else make all changes requested in the RFC.
3. EPA should provide “evidence” in a response that actually addresses the RFC challenge about sampling efficiency of amphiboles or else make all changes requested in the RFC.
4. EPA should provide evidence that the Johnson Conference presentation was not an attempt to respond to the RFC or else make all changes requested in the RFC.