August 28, 2018

Director Rick Keigwin
Office of Pesticide Programs
Environmental Protection Agency
2777 South Crystal Drive
Arlington, VA 22202

Information Quality Guidelines Staff (Mail Code 28 11 R)
U.S. EPA
1200 Pennsylvania Ave., NW
Washington, DC 20460
quality@epa.gov

Re: Demand for Correction under Information Quality Act: "EPA's Seven Year Quest for Columbia's Raw Data"

Director Keigwin, Information Quality Officer,

The Center for Biological Diversity (the "Center") hereby submits this Request for Correction under the Information Quality Act (IQA) of 2000,[1] the Office of Management and Budget (OMB) *Guidelines for Ensuring and Maximizing the Quality, Utility, and Integrity of Information disseminated by Federal Agencies*, and the Environmental Protection Agency's (EPA) Guidelines for Ensuring and Maximizing the Quality, Objectivity. Utility, and Integrity of Information Disseminated by the Environmental Protection Agency.

On or around August 27, 2018, the Environmental Protection Agency Office of Pesticide Programs posted a new page to its website entitled "EPA's Seven Year Quest for Columbia's Raw Data."[2] This website fails to comply with the IQA's basic requirements that all federal agencies provide public information that is objective, of adequate quality, utility, and high integrity.

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"[3] — to obtain raw data regarding a study completed by Columbia University "since 2010."

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.

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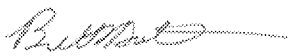
[1] Section 515 of the FY 2001 Treasury and General Government Appropriations Act, Pub. L. No. 106-554.
[2] https://www.epa.gov/ingredients-used-pesticide-products/chlorpyrifos-epas-seven-year-quest-columbias-raw-data
[3] https://www.merriam-webster.com/dictionary/quest?utm_campaign=sd&utm_medium=serp&utm_source=jsonld

Indeed a search of the regulatory docket for Chlorpyrifos does not result in ANY documents posted to the docket in the calendar year 2010 in the "Supporting documents" category,[4] nor does a search of the docket for "Columbia" and "letter" reveal any information that demonstrates that EPA has been engaging in a "Quest" for information.[5]

EPA has posted to its website a highly ideological, biased and unsubstantiated piece of propaganda in order to benefit Dow Chemical, Croplife America and the other special interests it now fully obeys. This propaganda is a clear violation of the Information Quality Act, is virtually unprecedented in its unprofessional tone, and is beneath the dignity of the Agency.

The Center requests that this webpage be removed immediately and hopes that it will be referred to the Inspector General for further review.

Thank you,



Brett Hartl
Government Affairs Director
Center for Biological Diversity

[4] See Attachments.
[5] See Attachments.

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Registration Review of Chlorpyrifos (PC Code 059101)

Docket Browser Return to Docket Folder Summary

Docket ID: EPA-HQ-OPP-2008-0850 **Agency:** Environmental Protection Agency (EPA)

Summary:
For further information contact: Dana Friedman (703-347-8827) Mail code 7508P

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6/27/11. Chlorpyrifos: Tier II Incident Report
Document Contents : ...children's health study populations (Columbia University, Mt. Sinai Hospital, and...analysis of urine samples. Toxicology Letters, 159, 235-251. BLONDELL, J...
Supporting & Related Material | Posted: 07/06/2011
ID: EPA-HQ-OPP-2008-0850-0032

Comments Not Accepted

EPA Letter to Columbia Mailman School of Public Health
Document Contents : ...New York, NY 10032 Re: Columbia Center for Children's Environmental...data.

Comments Not Accepted

Accordingly, please consider this letter a formal request for this...
Supporting & Related Material | Posted: 05/31/2016
ID: EPA-HQ-OPP-2008-0850-0871

Chlorpyrifos: Revised Human Health Risk Assessment for Registration Review
Document Contents : ...BMD Modeling ..... 383 Appendix 6. Columbia Center for Children's Environmental...pharmacodynamic (PBPK/PD) model. Toxicology Letters. 135, 51. Timchalk, C., et...
Supporting & Related Material | Posted: 12/31/2014
ID: EPA-HQ-OPP-2008-0850-0195

Comments Not Accepted

Response to the Petition by AMVAC to Postpone Chlorpyrifos SAP Meeting
Document Contents : ...underlying that peer reviewed research. Your letter also appears to suggest that the EPA's consideration of the Columbia study, in the absence of access...
Supporting & Related Material | Posted: 05/31/2016
ID: EPA-HQ-OPP-2008-0850-0870

Comments Not Accepted

Chlorpyrifos Dataset Discussion: Columbia Center for Children's Environmental Health Mothers and Newborns Study August 1, 2016, Teleconference
Document Contents : Chlorpyrifos Dataset Discussion: Columbia Center for Children's Environmental Health Mothers...this spring, there were three letters exchanged between Dr. Linda Fried...
Supporting & Related Material | Posted: 09/14/2016
ID: EPA-HQ-OPP-2008-0850-0930

Comments Not Accepted

Letter from Jack E. Housenger, Director, Office of Pesticide Programs to Dr. Linda P. Fried, Dean, Mailman School of Public Health, Columbia University, dated June 27, 2016
Document Contents : ...a secure data enclave at Columbia, that particular alternative does not resolve the transparency issue raised in my previous letter. EPA understands your concern for...
Supporting & Related Material | Posted: 08/09/2016
ID: EPA-HQ-OPP-2008-0850-0927

Comments Not Accepted

Letter from Linda P. Fried, Dean, Mailman School of Public Health, Columbia University, to Jack E. Housenger, Director, Office of Pesticide Programs, United States Environmental Protection Agency, dated May 18, 2016
Document Contents : ...Protection Agency Re: Columbia Center for Children's Environmental Health Epidemiology Study Data Dear Mr. Housenger, Thank you for your letter of April 19, 2016...

Comments Not Accepted

Supporting & Related Material | Posted: 08/09/2016
ID: EPA-HQ-OPP-2008-0850-0928

Federal Letter-Review of Chlorpyrifos Epidemiology Studies

Document Contents : ...D.C. 20460 RE: Federal Letter-Review of Chlorpyrifos Epidemiology Studies...produced by researchers with the Columbia Center on Children's Environmental...

Supporting & Related Material | Posted: 05/17/2013
ID: EPA-HQ-OPP-2008-0850-0170

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Registration Review of Chlorpyrifos (PC Code 059101)

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02/07/08, Chlorpyrifos 059101 Screening Level Usage Analysis (SLUA)
Supporting & Related Material | Posted: 03/18/2009
ID: EPA-HQ-OPP-2008-0850-0005

Comments Not Accepted

10/15/08, Updated Review of Chlorpyrifos Incidents Reports.
Supporting & Related Material | Posted: 03/18/2009
ID: EPA-HQ-OPP-2008-0850-0004

Comments Not Accepted

3/12/09. Chlorpyrifos Summary Document Registration Review: Initial Docket, March 2009
Supporting & Related Material | Posted: 03/18/2009 |
ID: EPA-HQ-OPP-2008-0850-0002

Comments Not Accepted

05/16/08, Appendix A: Food/Feed and Non-food/Non-feed Uses Considered in Registration
Supporting & Related Material | Posted: 03/18/2009 |
ID: EPA-HQ-OPP-2008-0850-0006

Comments Not Accepted

02/09/09, Chlorpyrifos. Human Health Assessment Scoping Document in Support of Registration Review
Supporting & Related Material | Posted: 03/18/2009 |
ID: EPA-HQ-OPP-2008-0850-0003

Comments Not Accepted

11/25/08, Registration Review – Preliminary Problem Formulation for the Ecological Risk and Environmental Fate, Endangered Species, and Drinking Water Assessments for Chlorpyrifos (PC Code 059101; DP Barcode D355212)
Supporting & Related Material | Posted: 05/01/2009 |
ID: EPA-HQ-OPP-2008-0850-0007

Comments Not Accepted

6-25-09 Slides from EPA Meeting with Dow AgroSciences
Supporting & Related Material | Posted: 07/23/2009 |
ID: EPA-HQ-OPP-2008-0850-0019

Comments Not Accepted

6-25-09 Sign-in Sheet for EPA Meeting with Dow AgroSciences
Supporting & Related Material | Posted: 07/23/2009 |
ID: EPA-HQ-OPP-2008-0850-0018

Comments Not Accepted

Chlorpyrifos Final Work Plan (FWP) - 9/25/09
Supporting & Related Material | Posted: 10/06/2009 |
ID: EPA-HQ-OPP-2008-0850-0020

Comments Not Accepted

Registration Review – Response to Comments on Preliminary Problem Formulation for Ecological Risk and Environmental Fate, Endangered Species and Drinking Water Assessments for Chlorpyrifos (PC Code 059101; DP Barcode D355212) - 8/5/09
Supporting & Related Material | Posted: 10/06/2009 |
ID: EPA-HQ-OPP-2008-0850-0021

Comments Not Accepted

Chlorpyrifos. Health Effects Division Response to Comments on the Registration Review Preliminary Work Plan. - 8/13/09

Comments Not Accepted

Supporting & Related Material | Posted: 10/06/2009 |
ID: EPA-HQ-OPP-2008-0850-0022

BEAD Response to Comments on Chlorpyrifos Preliminary Work Plan (DP#366702) - 7/28/09
Supporting & Related Material | Posted: 10/06/2009 |
ID: EPA-HQ-OPP-2008-0850-0023

Comments Not Accepted

6/30/11 - Revised Chlorpyrifos Acute and Chronic Dietary Exposure and Risk Assessments
Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0030

Comments Not Accepted

5/24/11. Chlorpyrifos. Registration Review Action for Chlorpyrifos. Summary of Analytical Chemistry and Residue Data.
Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0031

Comments Not Accepted

6/30/11 - Chlorpyrifos Preliminary Human Health Assessment for Registration Review
Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0025

Comments Not Accepted

6/27/11. Chlorpyrifos: Tier II Incident Report
Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0032

Comments Not Accepted

6/30/11 - Revised Chlorpyrifos Preliminary Reg Review Drinking Water Assessment
Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0026

Comments Not Accepted

7/1/11. Reader's Guide to the Preliminary Human Health Risk Assessment for Chlorpyrifos
Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0027

Comments Not Accepted

6/16/11. Chlorpyrifos Carcinogenicity: Review of Evidence from the U.S. Agricultural Health Study (AHS) Epidemiologic Evaluations 2003-2009
Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0029

Comments Not Accepted

6/27/11. Chlorpyrifos: Occupational and Residential Exposure Assessment
Supporting & Related Material | Posted: 07/06/2011 |
ID: EPA-HQ-OPP-2008-0850-0028

Comments Not Accepted

Chlorpyrifos Occupational and Residential Appendix A
Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0034

Comments Not Accepted

Chlorpyrifos Occupational and Residential Appendix B
Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0035

Comments Not Accepted

Chlorpyrifos Occupational and Residential Appendix F
Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0039

Comments Not Accepted

Chlorpyrifos Occupational and Residential Appendix E
Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0038

Comments Not Accepted

Chlorpyrifos Occupational and Residential Appendix D
Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0037

Comments Not Accepted

Revised Chlorpyrifos Preliminary Reg Review Drinking Water Assessment - Appendix D - Typical Use Data for Chlorpyrifos
Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0033

Comments Not Accepted

Chlorpyrifos Occupational and Residential Appendix H
Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0041

Comments Not Accepted

Chlorpyrifos Occupational and Residential Appendix C
Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0036

Comments Not Accepted

Chlorpyrifos Occupational and Residential Appendix G
Supporting & Related Material | Posted: 07/15/2011 |
ID: EPA-HQ-OPP-2008-0850-0040

Comments Not Accepted

2/17/11 - EPA's Chlorpyrifos BMD runs for the Preliminary Human Health Risk Assessment.

Comments Not Accepted

Supporting & Related Material | Posted: 04/30/2012 |
ID: EPA-HQ-OPP-2008-0850-0102

7/16/12. Spray Drift Mitigation Decision for Chlorpyrifos
Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0103

Comments Not Accepted

7/13/12. Chlorpyrifos -- Evaluation of the Potential Risks from Spray Drift and the Impact of Potential Risk Reduction Measures
Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0105

Comments Not Accepted

7/10/12. Dow AgroSciences -- Spray Drift Assessment and Drift Management Labeling Considerations
Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0104

Comments Not Accepted

7/13/12. Appendix G - Chlorpyrifos -- Evaluation of the Potential Risks from Spray Drift and the Impact of Potential Risk Reduction Measures
Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0108

Comments Not Accepted

7/13/12. Appendix F - Chlorpyrifos -- Evaluation of the Potential Risks from Spray Drift and the Impact of Potential Risk Reduction Measures
Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0107

Comments Not Accepted

7/13/12. Appendix E - Chlorpyrifos -- Evaluation of the Potential Risks from Spray Drift and the Impact of Potential Risk Reduction Measures
Supporting & Related Material | Posted: 07/18/2012 |
ID: EPA-HQ-OPP-2008-0850-0106

Comments Not Accepted

7/11/12 - Evaluation of Columbia University Epidemiology Study Claims Related to Brain Abnormalities and Pre-Natal Exposures to Chlorpyrifos
Supporting & Related Material | Posted: 08/08/2012 |
ID: EPA-HQ-OPP-2008-0850-0110

Comments Not Accepted

8/3/12 - Drift Potential of Banded Uses of Chlorpyrifos
Supporting & Related Material | Posted: 08/08/2012 |
ID: EPA-HQ-OPP-2008-0850-0109

Comments Not Accepted

Review of Two Environmental Fate Studies for Chlorpyrifos

Comments Not Accepted

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0122

Data Evaluation Record for Chlorpyrifos Air Photolysis Study MRID 48789701
Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0112

Comments Not Accepted

Data Evaluation Record for Chlorpyrifos Field Volatility Study - Potato MRID 48998801
Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0120

Comments Not Accepted

Attachment 2 PERFUM Modeling Files
Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0116

Comments Not Accepted

Chlorpyrifos Volatility Assessment: Guide to Commenters
Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0117

Comments Not Accepted

Attachment 1 Chlorpyrifos Master Use Summary Document
Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0115

Comments Not Accepted

Updated Data Evaluation Record for Chlorpyrifos Flux study MRID 48883201
Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0121

Comments Not Accepted

Information on Application Rates and Acres Treated per Application per Day for Selected Chlorpyrifos Formulations
Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0118

Comments Not Accepted

Updated: Evaluation of Direct Flux Measurement of Chlorpyrifos and Chlorpyrifos-Oxon Emissions Following Applications of Lorsban Advanced Insecticide to Alfalfa (MRID 48883201)
Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0119

Comments Not Accepted

Chlorpyrifos Preliminary Evaluation of the Potential Risks from Volatilization
Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0114

Comments Not Accepted

Information Package re Meeting between Dow AgroSciences and EPA to Discuss Chlorpyrifos and Recent Epidemiology Studies, the April 2012 SAP, and Dose Reconstruction

Supporting & Related Material | Posted: 02/06/2013 |
ID: EPA-HQ-OPP-2008-0850-0113

Comments Not Accepted

Federal Letter-Review of Chlorpyrifos Epidemiology Studies

Supporting & Related Material | Posted: 05/17/2013 |
ID: EPA-HQ-OPP-2008-0850-0170

Comments Not Accepted

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