

# **U.S. Environmental Protection Agency**

## **Information Quality FY04 Annual Report**

Description of the 12 Requests for Correction and 2 Requests for Reconsideration received by the U.S. Environmental Protection Agency between October 1, 2003 and September 30, 2004.



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DEC 23 2004

The U.S. Environmental Protection Agency (EPA) *Information Quality Fiscal Year (FY) 2004 Annual Report* summarizes the second year of implementation of the corrections process created as part of the 2002 *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency* (EPA Information Quality Guidelines or IQGs).

In accordance with the Data Quality Act of 2001, EPA has developed administrative procedures for responding to requests concerning the quality of information disseminated by the Agency. To facilitate this process, EPA has established a public Web site that provides easy access to information and frequently asked questions on EPA's IQGs. If a member of the public believes EPA is disseminating information that does not meet the Office of Management and Budget and/or EPA's quality principles for objectivity, utility, and integrity of information, that person may submit a Request for Correction (RFC). Additionally, for transparency purposes, responses to the requests are also available at <http://www.epa.gov/quality/informationguidelines>.

During FY04, the EPA received a diverse array of requests for correction. While the number of requests received was consistent with FY 2003 (13 RFCs were received), the FY 2004 requests more explicitly challenged the issues of objectivity, utility, and reproducibility of the information disseminated to the public. However, a number of the requests addressed information not disseminated by EPA, or covered by the IQGs. In response to some specific RFCs, EPA has made corrections to improve the transparency and presentation of information challenged on Agency Web sites.

EPA remains committed to sound and effective implementation of the Information Quality Guidelines to ensure that the highest quality information is disseminated to the public by this Agency.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly T. Nelson", with a long horizontal flourish extending to the right.

Kimberly T. Nelson  
Assistant Administrator and  
Chief Information Officer

**U.S. Environmental Protection Agency  
Information Quality FY 2004 Annual Report**

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## U.S. Environmental Protection Agency Information Quality FY 2004 Annual Report

### I. Requests Received FY 2004

EPA received 12 requests for correction (RFC) and two (2) requests for reconsideration (RFR) during the FY 2004 reporting period, October 1, 2003 – September 30, 2004. One (1) of these requests was designated as “influential” (RFR 12385A). A detailed summary of these requests can be found in Section III of this report.

- Geronimo Creek Observatory (RFC 12989 logged-in 10/10/2003)
- Center for Regulatory Effectiveness & American Chemistry Council Panel (RFC 13166 logged-in 10/22/2003)
- BMW Manufacturing Corporation (RFR 7421A logged-in 12/01/2003)
- Perchlorate Study Group (RFC 13679 logged-in 12/23/2003)
- National Multi-Housing Council (RFC 04017 logged-in 03/11/2004)
- Geronimo Creek Observatory (RFC 04018 logged-in 05/24/2004)
- U.S. Chamber of Commerce (RFC 04019 logged-in 05/27/2004)
- National Paint and Coatings Association and Sherwin-Williams (RFC 04020 logged-in 06/02/2004)
- Dow Chemical Corporation (RFC 04021 logged-in 06/15/2004)
- National Association of Home Builders (RFC 04022 logged-in 07/09/2004)
- NPC Services (RFC 04023 logged-in 08/31/2004)
- Geronimo Creek Observatory (RFC 04024 logged-in 09/08/2004)
- American Chemistry Council (RFC 04025 logged-in 09/15/2004)
- Private Citizen (RFR 12385A logged-in 09/23/2004) – *Influential*. Note: The information is considered “influential,” based on the general definition outlined in the EPA Information Quality Guidelines (Section 6.2), because the information was disseminated in support of a top Agency action.

Agency Information Quality correspondence can be found at:  
<http://www.epa.gov/quality/informationguidelines/iqg-list.html>

### II. FY 2003 Requests Completed in FY 2004

Four (4) Requests for Correction were received in FY03 that were completed in FY04. One (1) of these requests was designated as "Influential." A detailed summary of these requests can be found in Section III of this report.

- Friends of the Massachusetts Military Reservation (RFC 11702 logged-in 07/05/2003)
- Private Citizen (RFC 12385 logged-in 08/18/2003) - *Influential*
- Morgan, Lewis & Bockius (RFC 12467 logged-in 08/19/2003)
- Geronimo Creek Observatory (RFC 12856 logged-in 09/25/2003)

### III. Requests for Correction Processed in FY2004

Summaries of Requests for Correction (RFC) and Requests for Reconsideration (RFR) received and/or completed during FY04. Requests are listed in order of date received. All requests were received by the U.S. EPA.

#### RFC 11702

- **Requestor:** Friends of the Massachusetts Military Reservation
- **Date Received:** Email request received and logged-in July 5, 2003
- **Summary of Request:** The request states, "(1) The Federal and the Region 1 EPA have different advisory levels for perchlorate (4 to 18 vs. 1 ppb). (2) Region 1 EPA has different advisory levels for perchlorate for different situations (military vs. civilian fireworks). This approach lacks integrity and accuracy."
- **Description of Requested Correction:** The request states: "The EPA should adopt a uniform advisory level for perchlorate, even if an interim one."
- **Influential:** No
- **First Agency Response:** Completed February 23, 2004
- **Resolution:** The request was deemed incomplete because it did not include reference to a specific piece of information disseminated by EPA per the Information Quality Guidelines.
- **Appeal Request:** None
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

#### RFC 12385

- **Requestor:** David A. Smith, GDT Corporation
- **Date Received:** Email request dated and logged-in August 18, 2003.
- **Summary of Request:** Requestor identified ten (10) documents and/or Web pages, including the EPA Integrated Risk Information System (IRIS) file, that describe bromate

in all forms as a carcinogen. In Mr. Smith's request he contended that only potassium bromate is carcinogenic and not sodium bromate. The requestor pointed to supporting studies contained in the IRIS file that evaluate the effects of potassium bromate only.

- **Description of Requested Correction:** The requestor asked that EPA correct the documents on its Web site, set the Maximum Contaminant Level (MCL) for bromate to 1.0 mg/L, and establish a preliminary limit on the amount of potassium in drinking water.
- **Influential:** Yes
- **First Agency Response:** Completed April 28, 2004
- **Resolution:** EPA upheld its characterization of bromate as a likely human carcinogen based on its analysis of available scientific data.
- **Appeal Request:** E-mail dated 09/20/2004 and logged-in 09/23/2004
- **Summary of Request for Reconsideration:** The requestor was dissatisfied with the Agency response that upheld its characterization of bromate as a likely human carcinogen. The requestor also states that, "My RFC was directed at all US EPA Web pages and revisable documents that present bromate as a carcinogen, not just the few originally referenced."
- **Type of Appeal Process Used:** Following the process set out in the EPA Information Quality Guidelines, the request for consideration will be presented to an executive panel who will review the original request along with the request for reconsideration.
- **Appeal Resolution:** In progress

#### **RFC 12467**

- **Requestor:** Morgan, Lewis & Bockius
- **Date Received:** Mail request dated August 19, 2003, logged-in August 27, 2003
- **Summary of Request:** The request included 4 main concerns: (1) The statements in the EPA Gold Book ("Guidance for Preventing Asbestos Disease Among Auto Mechanics," is otherwise known as the "Gold Book") were based on inadequate and inappropriate scientific data and literature at the time of its original preparation, (2) The Gold Book is now 17 years old and is badly outdated in light of significant scientific studies published since 1986, (3) The Gold Book's origins, preparation, funding, review, and approval are largely undocumented and (4) The Gold Book is routinely used to convey the misperception that EPA has conducted a complete analysis of the scientific and medical literature and has concluded that brake mechanic work is in fact hazardous and that as a

direct result brake mechanics are at increased risk of contracting an asbestos related disease, including mesothelioma, from such exposure.

- **Description of Requested Correction:** The request had 3 recommendations for corrective action: (1) EPA discontinue disseminating the Gold Book, (2) EPA post a caveat on EPA's Web site to the effect that the 1986 Gold Book is no longer current from a scientific perspective, or, as an alternative, (3) EPA analyze the scientific information contained in the Gold Book and update it so that it reflects a "complete assessment of the extensive medical and scientific literature on the subject, particularly given the development since 1986 of a significant body of scientific data showing no increased asbestos-related health risks associated with brake work".
- **Influential:** No
- **First Agency Response:** Completed November 24, 2003
- **Resolution:** EPA is embarking on an overall effort to update and revise, as appropriate, various information materials associated with the Agency's Asbestos program. As part of this effort, EPA has begun the process of updating the auto mechanics' brochure. We intend to engage all interested stakeholders and to provide the general public with an opportunity to review and comment on changes to the brochure before it is finalized. We anticipate it being available for comment in the Spring of 2004. In the interim, both the hard copy and electronic versions of the brochure will include a note stating that the Agency is in the process of updating the material in the document.
- **Appeal Request:** None
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

#### **RFC 12856**

- **Requestor:** Forrest Mims III, Geronimo Creek Observatory
- **Date Received:** Email request dated and logged-in September 25, 2003.
- **Summary of Request:** Mr. Mims contested the data collected from an air monitoring site in San Antonio, Texas, during the calendar year 2002. Specifically, the data collected via CAMS 23 (AIRS ID 480290032) and disseminated on the EPA AIRNow Web page. Mr. Mims' request stated "Ozone concentrations measured at CAMS 23 in San Antonio, Texas, during summer 2002 were accepted by EPA, despite protests from

me and others that the ozone analyzer was faulty and provided data that does meet acceptable scientific standards." He also challenged the calibration, the calculations, and the model used in the ozone concentration determinations.

- **Description of Requested Correction:** Mr. Mims requested that "The EPA  $\pm$ 20% calibration tolerance for ozone and other gas analyzers must be changed to comply with the 'best available monitoring' requirements of the Clean Air Act and customary definitions of accuracy." He recommended "that EPA assign an independent panel of scientists to review the current standard at the earliest possible date." Furthermore, the request stated, "EPA should immediately remove from its Web site and from consideration all data from CAMS 23 that was known to be deficient by the TCEQ regulators and possibly the EPA. There is abundant internal TCEQ correspondence concerning this error that will be produced should this request require an appeal."
- **Influential:** No
- **First Agency Response:** Completed January 12, 2004
- **Resolution:** EPA has included disclaimer language on the AIRNow "Where you Live" Web page to ensure the public is aware of quality considerations. The CAMS 23 site was determined to meet the uncertainty acceptance levels for both the calibration tolerances and precision probability limits in the TCEQ Quality Assurance Project Plan approved by EPA Region 6.
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

#### **RFC 12989**

- **Requestor:** Forrest Mims III, Geronimo Creek Observatory
- **Date Received:** Email request dated and logged-in October 10, 2003.
- **Summary of Request:** The request stated that the EPA report "2002 Latest Findings on National Air Quality" includes important errors and omissions.
- **Description of Requested Correction:** The requestor asked that the report be corrected.
- **Influential:** No



- **First Agency Response:** Completed March 8, 2004
- **Resolution:** EPA made some clarifying changes to the EPA Air Trends Web page and intends to consider some of the comments in future issues of the annual Air Trends booklet. A detailed response to each of the requestor's questions and comments on the 2002 booklet was provided.
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

#### **RFC 13166**

- **Requestors:** William Kelly, Jr., Center for Regulatory Effectiveness, and Marian Stanley, American Chemistry Council Panel
- **Date Received:** Mail request dated October 16, 2003 received on October 20, 2003 and logged-in October 22, 2003.
- **Summary of Request:** The request concerned the EPA technical review of diisononyl phthalate (DINP) and EPA's proposal to add a DINP category to the list of chemicals subject to reporting under section 313 of the Emergency Planning and Community Right-to-Know Act. The DINP review is disseminated in the document "Technical Review of Diisononyl Phthalate, CAS NO. 028553-12-0, 071549-78-5, 014103-61-8, 068515-48-0, Office of Environmental Information, Environmental Analysis Division, Analytical Support Branch, August 2000."
- **Description of Requested Correction:** The requestor asked that a revised review be made available for public comment and subjected to external peer review, and that EPA undertake a rulemaking to clarify language in the preamble to EPA's 1994 chemical expansion.
- **Influential:** No
- **First Agency Response:** Completed March 15, 2004
- **Resolution:** As part of the DINP rulemaking, EPA has already initiated a process to revise the DINP hazard assessment and solicit public comments on the revised assessment. In accordance with the Information Quality Guidelines, EPA treated the

request as a late comment on the proposed rule (65 FR 53681, September 5, 2000) and placed the request in the docket for this rulemaking.

- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

#### **RFR 7421A**

- **Requestor:** Gary Weinreich, BMW Manufacturing Corporation
- **Date Received:** Mail dated November 25, 2003, and logged in December 1, 2003
- **Appeal Request:** The request asks that EPA reconsider its decision to characterize a BMW manufacturing facility in Greer, South Carolina, as a significant non-complier under the Resource Conservation and Recovery Act (RCRA) in the EPA online Enforcement & Compliance History Online (ECHO) and Sector Facility Indexing Project (SFIP) Web pages. The request also enumerated several legal questions for the panel to consider in its decision.
- **Summary of Request for Reconsideration:** The requestor asked that EPA no longer characterize the BMW manufacturing facility in Greer, South Carolina as being in significant noncompliance under RCRA and therefore remove such designation from the appropriate ECHO and SFIP Web pages.
- **Type of Appeal Process Used:** Following the process set out in the EPA Information Quality Guidelines, the request for consideration was presented to an executive panel that reviewed the original request along with the request for reconsideration and decided on an appropriate response.
- **First response:** Completed May 13, 2004
- **Appeal Resolution:** The Panel agreed with the original determination in the August 27, 2003, response to BMW's RFC. The information in ECHO and SFIP accurately reflect EPA's compliance determination in regard to BMW.

#### **RFC 13679**

- **Requestor:** Michael Gerard, Perchlorate Study Group

- **Date Received:** Mail request dated December 3, 2003, received December 22, 2003, and logged-in December 23, 2003.
- **Summary of Request:** The request concerns the transparency and reproducibility of information regarding certain information on rat brain morphological changes contained in documents associated with the EPA draft assessment of "Perchlorate Environmental Contamination: Toxicological Review and Risk Characterization." EPA submitted the draft document to the National Academy of Sciences to assess the health implications of perchlorate ingestion.
- **Description of Requested Correction:** PSG requests that EPA provide the study slides and data set supporting the perchlorate risk characterization study.
- **Influential:** No
- **First Agency Response:** Completed September 15, 2004
- **Resolution:** The document is an external review draft which has not been disseminated in accordance with the Information Quality Guidelines. EPA intends to consider PSG's comments with the peer review comments from the National Academy of Sciences.
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

#### **RFC 04017**

- **Requestors:** Dr. Eileen Lee, Ph.D., National Multi Housing Council, National Apartment Association, Builders Owners and Managers Association International, Institute of Real Estate Management, National Association of Industrial and Office Properties, National Association of Real Estate Investment Trusts, National Association of Realtors, National Leased Housing Association, The Real Estate Roundtable, The U.S. Chamber of Commerce
- **Date Received:** E-mail request dated March 10, 2004 and logged-in on March 11, 2004
- **Summary of Request:** The request concerns information involving ratio utility billing systems (RUBS) and other allocation billing systems disseminated by EPA in its draft memorandum on the Applicability of Safe Drinking Water Act to Submetered Properties ('Revised Policy') published in the Federal Register on December 23, 2004 (68 Fed. Reg.

74233). Specifically, the requestors claim that EPA's statement that "EPA believes that RUBS or other allocation billing systems do not encourage water conservation" (68 Fed.Reg. 74235) is erroneous.

- **Description of Requested Correction:** NHMC requests that EPA: (1) disclose the process that the statement at issue underwent as part of EPA's internal, pre-dissemination review process; and (2) conduct a comprehensive literature review of the established studies, available in the open literature, to determine whether its statement at issue complies with the Guidelines. If EPA concludes that these utility systems do encourage water conservation, the requestors ask that EPA correct the statement in the revised policy and reissue its Revised Policy to treat RUBS and other allocation billing systems the same way it treats water submetering.
- **Influential:** No
- **First Agency Response:** Completed August 5, 2004
- **Resolution:** EPA plans to consider the information and recommendations contained in RFC in making determination of whether RUBS does or does not encourage water conservation.
- **Appeal Request:** E-mail dated November 5, 2004, and logged-in November 9, 2004
- **Summary of Request for Reconsideration:** The requestor states, "However, since we consider the Agency to have agreed with our request, we do not believe that promising some Agency action sometime in the unspecified future is sufficient to address our request for correction."
- **Type of Appeal Process Used:** Following the process set out in the EPA Information Quality Guidelines, the request for consideration will be presented to an executive panel who will review the original request along with the request for reconsideration.
- **Appeal Resolution:** In progress

#### **RFC 04018**

- **Requestor:** Forrest Mims III, Geronimo Creek Observatory
- **Date Received:** E-mail request dated May 23, 2004 and logged-in May 24, 2004
- **Summary of Request:** Requestor stated that locational data on Guadalupe County, Texas is incorrect in the EPA Designation and Classification of Areas for the 8-Hour Ozone National Ambient Air Quality Standard. Also, the requestor noted that the

information on pages 173 and 199- 200 places Guadalupe County in a non-attainment status. (Ref. EPA's Docket Number OAR-2003-0083, dated April 15, 2004.)

- **Description of Requested Correction:** The request stated that (1) Guadalupe County is upwind of the core metroplex during the ozone season and therefore, emissions carry into the County, (2) the County is located east-northeast, not east south-east, and (3) EPA's data are incorrect and should promptly be removed and replaced with scientifically correct statements.
- **Influential:** No
- **First Agency Response:** Completed September 21, 2004
- **Resolution:** After carefully reviewing the RFC which requests correction of a supporting document to a final rule, EPA has determined that the request does not contain significant new information or analysis that would warrant reopening or reconsidering the final decision.
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

#### **RFC 04019**

- **Requestor:** William Kovacs, U.S. Chamber of Commerce
- **Date Received:** E-mail request dated May 26, 2004, and logged in May 27, 2004
- **Summary of Request:** The requestor stated that sixteen EPA databases contain inconsistent numerical data entries for physical-chemical constants characteristics for various chemicals that are used in commerce or occur in the environment.
- **Description of Requested Correction:** The request stated that EPA, to the extent that it disseminates information about these chemicals and chemical mixtures and to the extent that it disseminates these databases, should assure that the databases consistently and uniformly indicate the same, correct numerical value for any listed physical or chemical property parameter associated with the identified chemicals and chemical mixtures regardless of what database is consulted (or what model is used).
- **Influential:** No

- **First Agency Response:** In progress
- **Resolution:** In progress
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

**RFC 04020**

- **Requestors:** E. Donald Elliot, Willkie Farr & Gallagher, L.L.P. on behalf of NPCA and Sherwin-Williams
- **Date Received:** E-mail request dated and logged in June 2, 2004
- **Summary of Request:** Request for correction of and peer review of data supporting the EPA Ozone Transport Commission Model Rule (Model Rule) for Volatile Organic Compounds (VOCs) for Architectural and Industrial Maintenance (AIM )Coatings
- **Description of Requested Correction:** Sherwin Williams claims that the States Implementation Plans (SIP) are more stringent than EPA's requirements and the data underlying the Model Rule and the SIPs are flawed because they are base on the Pechan Report. They request peer review of the information submitted by E.H. Pechan & Associates that support the model.
- **Influential:** No
- **First Agency Response:** In progress
- **Resolution:** In progress
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

### **RFC 04021**

- **Requestor:** Anne Crochet, Taylor, Porter, Brooks & Phillips, L.L.P., on behalf of Dow Chemical Company
- **Date Received:** E-mail request dated June 14, 2004 logged in June 15, 2004
- **Summary of Request:** The request asks that the "Combined Quality Assurance Project Plan and General Work Plan: Potential Ground-water Flow Directions and Contaminant Fate and Transport in the Plaquemine Aquifer of Iberville Parish and West Baton Rouge Parish, Louisiana" be amended to include more specific information on the model to be developed as described in the Quality Assurance (QA) Project Plan. The request also asks that the amended QA Project Plan undergo an external peer review.
- **Description of Requested Correction:** The requestor asks that EPA be prohibited from disseminating the model or any outputs from the model, until this RFC has been completed.
- **Influential:** No
- **First Agency Response:** Completed September 30, 2004
- **Resolution:** EPA does not consider this material to be an official dissemination under the Agency's Information Quality Guidelines. The QA Project Plan was intended as an internal EPA planning document for intra- or inter-agency use.
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

### **RFC 04022**

- **Requestor:** Gerald M. Howard, Executive Vice President and CEO, National Association of Home Builders
- **Date Received:** E-mail request dated and logged in July 9, 2004

- **Summary of Request:** NAHB requests that EPA correct information in a fact sheet concerning "US vs. Wal-Mart Stores" dated May 12, 2004, because the document contains misleading and erroneous statements about storm water runoff from construction sites being primary cause of water quality impairment. Detailed descriptions of objections are provided, along with citations from other EPA documents intended to support NAHB's assertions.
- **Description of Requested Correction:** NAHB requests that: (1) EPA remove references to storm water runoff from construction sites as sources of pathogens, oil, grease, or heavy metals, and any implication that construction site storm water runoff is a significant source of those pollutants, (2) EPA remove any and all statements that assert or imply that storm water runoff is a primary source of water quality impairment, (3) citations to the "1998 Report to Congress" be corrected to reflect that the report title carries a year of 1996, and (4) EPA remove a section titled "Environmental Harm and Public Health Impacts Associated with Storm Water Runoff" from this and future fact sheets connected to enforcement actions for violations of storm water permitting requirements for runoff from construction sites, on the basis that the section presents false and/or misleading statements about construction as matters of fact.
- **Influential:** No
- **First Agency Response:** In progress
- **Resolution:** In progress
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

#### **RFC 04023**

- **Requestor:** Reed Rubinstein, Greenberg Traurig, L.L.P. on behalf of NPC Services
- **Date Received:** E-mail request dated August 30, 2004 logged in August 31, 2004
- **Summary of Request:** Request states that EPA should disclose the data and methods needed to determine whether "influential" information disseminated by EPA regarding the National Priorities List (NPL) listing of Devil's Swamp Lake in Louisiana meets the Information Quality Guidelines and that EPA should correct certain disseminated influential information that does not appear to meet statutory and OMB IQGs.



- **Description of Requested Correction:** Request asks that the EPA produce the data and methods needed to determine whether influential information disseminated by EPA regarding the National Priorities List listing of Devil's Swamp Lake in Louisiana meets IQG requirements and at the same time, EPA retract the cited disseminated information until further review is conducted by EPA.
- **Influential:** No
- **First Agency Response:** In progress
- **Resolution:** In progress
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

#### **RFC 04024**

- **Requestor:** Forrest Mims III, Geronimo Creek Observatory
- **Date Received:** E-mail request dated and logged in September 8, 2004
- **Summary of Request:** Request states that the description of formation and sources of ozone and nitrogen oxides on the EPA Urban Air Web page contains erroneous information.
- **Description of Requested Correction:** Request asks that EPA replace "erroneous statements" with "scientifically correct statements" and "find objective scientific peer reviewers to review and correct all EPA Web pages."
- **Influential:** No
- **First Agency Response:** In progress
- **Resolution:** In progress
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable

- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable

**RFC 04025**

- **Requestor:** Courtney M. Price, American Chemistry Council Aliphatic Diisocyanates Panel
- **Date Received:** Mail dated September 8, 2004, received and logged in September 15, 2004
- **Summary of Request:** Request includes suggested changes to toxicology section of the Isocyanates Profile on the EPA Office of Pollution Prevention and Toxics (OPPT) “Design for the Environment” Web page (<http://www.epa.gov/opptintr/dfe>).
- **Description of Requested Correction:** Suggested corrective actions include: (1) remove statement that isocyanates "may affect many organ systems"; (2) distinguish carcinogenic potential of aliphatic and aromatic diisocyanates; and (3) distinguish toxicological characterizations of monomer, prepolymer, and polymer compounds, and also homo- and hetero-polymers, and accurately state monomer contents of polymers.
- **Influential:** No
- **First Agency Response:** In progress
- **Resolution:** In progress
- **Appeal Request:** Not applicable
- **Summary of Request for Reconsideration:** Not applicable
- **Type of Appeal Process Used:** Not applicable
- **Appeal Resolution:** Not applicable