



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

**JUL 11 2005**

OFFICE OF  
ENVIRONMENTAL INFORMATION

Ms. Lynn L. Bergeson  
Bergeson & Campbell, P.C.  
1203 Nineteenth Street, N.W.  
Suite 300  
Washington, D.C. 20036-2401

Re: Request for Correction -- Risk Assessment  
for Metam Sodium (RFC #05004)

Dear Ms. Bergeson:

This letter is in response to your Request for Correction (RFC), on behalf of the Metam Sodium Alliance (Alliance), dated June 24, 2005, and received by the U.S. Environmental Protection Agency (EPA), via e-mail, on June 24, 2005. In your letter, you request correction, under EPA's Information Quality Guidelines (IQGs), of information that you state was disseminated in EPA's January 31, 2005, "Human Health Risk Assessment: Metam Sodium (Risk Assessment)." After careful review of your request, EPA has determined that a well established process for pesticide reregistration exists to address your concerns. As discussed below, your RFC will be forwarded to the EPA Office of Pesticide Programs (OPP) to be incorporated into the docket for the metam sodium reregistration process, as part of the public comment phase of EPA's established pesticide reregistration program.

At this time, metam sodium is being reviewed by OPP as part of EPA's ongoing program to reevaluate, or "reregister," older pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).<sup>1</sup> OPP uses a six-phase process to conduct such reregistrations (the process is described on our Web site at <http://www.epa.gov/oppsrrd1/public.htm>). The January 31, 2005, Risk Assessment you cite in your RFC is a draft document that was provided to the registrants of metam sodium and the United States Department of Agriculture (USDA) as a step in OPP's six-phase process. This step offers pesticide registrants and the USDA an opportunity to review and correct errors before the risk assessment is available in the docket or on EPA's Web site for public review and comment.

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<sup>1</sup>Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA); 7 U.S.C. 136 et seq. (1996).

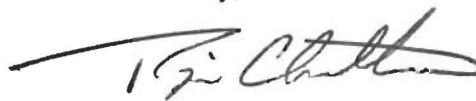
As you noted, the Alliance has already submitted comments to OPP as part of the reregistration process. OPP will consider and address those comments as part of that process. As described in Section 8.5 of the IQGs, EPA believes that the thorough consideration provided by the public comment process "serves the purposes of the IQGs, and provides adequate opportunity for correction of any information that is not in conformance with the IQGs." The public comment process for pesticides reregistrations, including the Risk Assessment phase, provides ample opportunity for registrants and the public to submit their concerns about the reregistration of a particular pesticide to EPA for its consideration and response prior to reaching a final decision. In the case of metam sodium, the revised preliminary Risk Assessment will be available for public review and comment on July 13, 2005, initiating phase 3 of OPP's six-phase process. This public review and opportunity for comment also serves the purpose of ensuring the quality of information that will eventually be incorporated into the Agency's final decisions on the pesticide reregistrations. EPA has also scheduled a "Technical Briefing" to present the Agency's preliminary risk assessments for four soil fumigant pesticides, including metam sodium, to interested stakeholders. For additional information about this public meeting, go to [http://www.epa.gov/oppfead1/cb/csb\\_page/updates/fumigants\\_meeting.htm](http://www.epa.gov/oppfead1/cb/csb_page/updates/fumigants_meeting.htm).

The Agency's goal is to be transparent in our decision-making processes. The IQGs support this goal by incorporating the principles of "quality" (objectivity, utility and integrity) in the information used to support final agency decisions, such as the reregistration of a pesticide.

If you are dissatisfied with this decision, you may submit a "Request for Reconsideration" (RFR). EPA recommends that this request be submitted within 90 days of the date of this letter. To do so, send a written request to the EPA Information Quality Guidelines Processing Staff via mail (Information Quality Guidelines Staff, Mail Code 2811R, U.S. EPA, 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460), electronic mail ([quality@epa.gov](mailto:quality@epa.gov)), or fax (202-565-2441). The RFR should reference RFC # 05004. Additional criteria for information that should be included in the request is listed on the EPA Information Quality Guidelines Web site ([www.epa.gov/quality/informationguidelines](http://www.epa.gov/quality/informationguidelines)).

If you have additional questions on the reregistration of metam sodium, please contact Margaret Rice of OPP at (703) 308-8039; you may also contact me at (202) 564-6830 for any questions on EPA's IQG program.

Sincerely,



Reggie Cheatham  
Director, Quality Staff

cc: Susan Hazen, OPPTS (7101M)  
Margaret Schneider, OPPTS (7101M)  
Jim Jones, OPP (7501C)  
Margaret Rice, OPP (7508C)  
Linda Travers, OEI (2810A)