



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 27, 2023

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Dr. Christopher Bevan, PhD, MPH, DABT
Director, Scientific Programs
Halogenated Solvents Industry Alliance, Inc. (HSIA)
3033 Wilson Boulevard, Suite 700
Arlington, Virginia 22201

Dear Dr. Bevan,

This letter is the response to the Request for Correction (RFC), dated January 26, 2021, and assigned **RFC #21002** for tracking purposes¹, that was submitted to the U.S. Environmental Protection Agency pursuant to EPA's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency² (EPA IQG). In the RFC, the HSIA cites the "objectivity, utility and integrity" criteria of the EPA IQG in requesting the correction of information in the following EPA document disseminated by the Office of Pollution Prevention and Toxics:

"Risk Evaluation for Carbon Tetrachloride (Methane, Tetrachloro-); CASRN: 56-23-5" issued pursuant to section 6 of the Toxic Substances Control Act (TSCA) in October 2020 (herein after referred as the "CTC Risk Evaluation").³

In requesting that the CTC Risk Evaluation be corrected, the HSIA claims the following two 'key deficiencies':

- (1) **Dermal Exposure Assessment:** The CTC Risk Evaluation fails to incorporate longstanding workplace practices recognized and required by EPA in the National Emission Standards for Hazardous Air Pollutants (NESHAP). It instead relies on unrealistic assumptions about dermal exposure in the manufacturing sector, resulting in an amount of CTC absorbed by workers from skin contact that is thousands of times higher than from real world exposures.
- (2) **Hazard Assessment:** The CTC Risk Evaluation uses a linear non-threshold model coupled with an assumption that the principal study relied upon did not produce a no-observed-adverse-effect level (NOAEL), both in disregard of advice provided by outside peer reviewers, again resulting in estimates of risk thousands of times higher than reality.

The EPA IQG outlines administrative mechanisms for EPA pre-dissemination review of information products and describe mechanisms to enable affected persons to seek and obtain corrections from EPA

¹ <https://www.epa.gov/quality/rfc-21002-carbon-tetrachloride>.

² <https://www.epa.gov/quality/guidelines-ensuring-and-maximizing-quality-objectivity-utility-and-integrity-information>

³ <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-evaluation-carbon-tetrachloride>.

regarding disseminated information that they believe does not comply with EPA or Office of Management and Budget (OMB) guidelines (i.e., OMB Information Quality Guidelines and Memorandum M-19-15)⁴. EPA is committed to applying these guidelines, including each of the updates outlined in M-19-15 to the EPA Information Quality Guidelines. The RFC process under the EPA IQGs is intended to provide a mechanism to correct errors where the disseminated product does not meet information quality standards. The EPA IQG specifically states that it is not intended to duplicate or interfere with the orderly conduct of a process involving public comment opportunities that allow for the correction of any information that does not comply with the Guidelines.⁵

A key component of the TSCA existing chemical evaluation process is the reiterative public comment opportunities that are provided throughout each stage of the process, and EPA has concluded that the public comment process is integrated throughout the 3-stages of the TSCA existing chemical evaluation process. Those public comment opportunities serve the purposes of the EPA IQGs by providing opportunities for the correction of any information that does not comply with the Guidelines.

The EPA, after review of the RFC submitted by HSIA, has concluded that the issues raised in your RFC are more appropriately addressed in the public comment opportunities that are integrated in the TSCA existing chemical evaluation process for CTC, rather than through a separate response mechanism under the EPA IQGs. In fact, your comments were addressed in the context of the TSCA existing chemical risk evaluation process. As such, EPA is denying your RFC.

Thank you for your interest in EPA's information quality. Should you have questions or need additional information about the EPA's IQG process, you may contact us via email to quality@epa.gov (our preferred method), or via regular mail to the EPA Information Quality Guidelines Processing Staff, Mail Code 2811R, U.S. EPA, 1200 Pennsylvania Avenue, NW, Washington, DC 20460.

Sincerely,

**MICHAL
FREEDHOFF**

Digitally signed by MICHAL
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Date: 2023.07.27 13:41:55
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Michal Freedhoff, Assistant Administrator

cc: Vaughn Noga, Chief Information Officer and Deputy Assistant Administrator for Environmental Information, Office of Mission Support

Katherine Chalfant, Director of Enterprise Quality Management Division, Office of Enterprise Information Programs, Office of Mission Support

⁴ <https://www.epa.gov/quality/guidelines-ensuring-and-maximizing-quality-objectivity-utility-and-integrity-information>

⁵ See Section 8.5 of the EPA IQG.