OFFICE OF FINANCE AND ADMINISTRATION
WASHINGTON, D.C. 20460

November 25, 2025

Dr. Steven Lasee
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Via Email: *Hello@LaseeConsulting.com*

Mr. Timothy Whitehouse
Executive Director
Public Employees for Environmental Responsibility (PEER)
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Via Email: *twhitehouse@peer.org*

Dear Dr. Lasee and Mr. Whitehouse,

This letter is in response to your Request for Reconsideration (RFR),[1] received by the U.S. Environmental Protection Agency on December 30, 2024, which was assigned RFR #24001A for tracking purposes. Your RFR requests that the Agency reconsider its denial of your Request for Correction (RFC) 24001[2] under the Information Quality Act.[3]

This request is based on PEER's claim that EPA's denial:

I. Failed to Address the Substance of the Complaint
II. Ignored the Identified Violations of Procedures for Maximizing Information Quality
III. Improperly Failed to Apply the Standard of Review for Influential Information
IV. Did Not Address Threat to Public Health Caused by EPA's Violations

PEER raises the same issues in this request for reconsideration as it did in its request for correction submitted on 5/28/2024.[4] EPA denied PEER's request for correction in a response dated 9/24/2024.[2]

In accordance with EPA's Information Quality Guidelines,[5] a three-member executive panel met on June 5, 2025, to review your request and the information you provided. The panel determined that EPA's denial of the RFC 24001 was based on a careful examination of all the scientific and technical questions that PEER raised in this request for reconsideration.

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[1] *https://www.epa.gov/system/files/documents/2025-01/12_30_24-reconsideration-iqa-lassee-002.pdf*
[2] *https://www.epa.gov/system/files/documents/2024-09/24001_rfc_pfas-in-pesticides_epa_response_aa_esigned_2024-09-24_0.pdf*
[3] Treasury and General Government Appropriations Act, Pub. L. No 106-554, §515 (Fiscal Year 2001)
[4] *https://www.epa.gov/system/files/documents/2024-05/5_28_24_information-quality-act-demand-for-correction-final-signed-twsl.pdf*
[5] *https://www.epa.gov/sites/default/files/2020-02/documents/epa-info-quality-guidelines_pdf_version.pdf*

Background

Dr. Steven Lasee and his colleagues from Texas Tech University published an article in the *Journal of Hazardous Materials Letters* in November 2022, reporting the presence of perfluoroctanoic sulfonate (PFOS) in eight of the ten tested pesticide products at 3.9 to 19.2 parts per million (ppm) levels.[6] PFOS is a member of per- and poly-fluoroalkyl substances (PFAS) that is not supposed to be present in formulated pesticide products based on their approved confidential statements of formula. Dr. Yaorong Qian of EPA contacted Dr. Lasee in November 2022 about this article and asked if Dr. Lasee could send some of the tested pesticide products for EPA to conduct an independent study to verify the reported results. Dr. Lasee agreed and sent aliquots of the same ten pesticide products he had tested. EPA also purchased from the open market four of the tested products (same brand names, different lot #) that were tested for PFOS in Dr. Lasee's study.

EPA conducted its study using the method described in Dr. Lasee's article and an EPA method developed for determination of PFAS compounds in pesticide products. The EPA's Analytical Chemistry Branch laboratory (ACB) could not replicate Dr. Lasee's study results, as they did not identify any PFOS, nor any other PFAS that is native to the pesticide product samples from Dr. Lasee or those EPA purchased. The estimated limit of detection of PFAS utilizing EPA's method is about 0.2 parts per billion (ppb), compared to that of Dr. Lasee's method of about 0.5 ppm (500 ppb). EPA released the study results in May 2023.[7] EPA has shared with PEER all the records and documents associated with the analytical work for this released report through responses to PEER's Freedom of Information Act (FOIA) requests (dated 6/15/2023, 9/12/2023).[8]

On March 4, 2024, PEER sent a request to EPA with the subject of "Demand for Retraction and Apology."[9] In response, EPA addressed all of PEER's questions and comments, ranging from technical clarifications and scientist-to-scientist communications, item by item and provided detailed explanations on the rationale and scientific basis of how the ACB study was conducted and how the conclusions of the study were reached in a letter dated April 22, 2024.[10]

On May 28, 2024, PEER sent a second request with the subject of "Demand for Correction under the Information Quality Act: Retraction of Research Memo Entitled 'Verification Analysis for PFAS in Pesticide Products (ACB Project B23-05b)' dated May 18, 2023, and Accompanying Press Release dated May 23, 2023."[4] In this request, PEER largely repeated the same demands as in PEER's March 4, 2024[9] request, with additional claims related to the Information Quality Act and impacts on health. EPA responded to this second information request on September 24, 2024[2] and provided the basis and

[6] Steven Lasee, Kaylin McDermett, Naveen Kumar, Jennifer Guelfo, Paxton Payton, Zhao Yang, Todd A. Anderson, Targeted Analysis and Total Oxidizable Precursor assay of several insecticides for PFAS - ScienceDirect. Journal of Hazardous Materials Letters, Volume 3, November 2022,100067. *https:// www.sciencedirect.com/science/article/*
[7] *BEAD PFAS Study Results 2023.pdf*
[8] *https://foiapublicaccessportal.epa.gov/app/ReadingRoom.aspx*
[9] *https://www.epa.gov/system/files/documents/2024-08/demand-for-retraction-and-apology.pdf*
[10] *https://www.epa.gov/system/files/documents/2024-05/5-28-24-epa-response-to-peer_4-22-24.pdf*

reasons for the denial. EPA provided further explanations on two scientific and technical issues that PEER repeated in the May 28, 2024, request to emphasize the importance of correctly applying scientific knowledge and skills for interpretation of the background level signals in the analysis of complex sample matrices.

Issues Raised in the RFR

The focus of this RFR is EPA's decision to deny PEER's May 28, 2024, Request for Correction of Information (RFC).[4]

1. **PEER Claims that EPA Failed to Address the Substance of the Complaint.**

   PEER's May 28th request alleged seven significant departures from accepted scientific practices and scientific departures. In their RFR, PEER claims that EPA's response of September 24th failed to address two of the seven issues: 1) the spike of the product by Dr. Lasee prior to sending the samples to the EPA Analytical Chemistry Branch's (ACB's) Lab and 2) identification of possible PFAS peaks near the background level. PEER claims the response to these issues was inadequate:

   > **PEER Claim 1(a).** "AA Freedhoff did not address that the EPA did, in fact, find PFOS in the exact samples Dr. Lasee spiked, but levels the EPA found were much lower than the concentration at which they were spiked. This indicates that EPA's extraction method performed poorly. Specifically, samples 1 and 2 were spiked at 1 part per billion (ppb), samples 3 and 4 at 5 ppb, and 5 and 6 at 10 ppb."
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   > **PEER Claim 1(b).** "AA Freedhoff dismissed the rampant PFAS contamination in their samples as chromatographic noise background signal, and trace contamination. Given that this "contamination" (see original complaint in Attachment 1 for an itemized list) was abundant in both the samples sent to the EPA and the samples they independently obtained, in concentrations above their lowest calibration curve points, and frequently in concentrations *orders of magnitude* higher than their procedure blanks, this contamination cannot simply be dismissed, and the EPA cannot assert that the samples were free of PFAS. Additionally, AA Freedhoff's assertion that the EPA followed their own Standard Operating Procedure (SOP) is indefensible. Referencing "SOP No. ACB-004 R 3.1 PROJECT B23-05c – PFAS in Pesticide Products-Method Validation and Sample Analysis" the EPA stated: "Pesticide sample analysis shows that all the detected peaks in some samples are near the background levels as in blanks and control blanks (generally < 2X of that in blanks). Therefore, all the peaks detected are all false positives and will not be reported." Given this statement, all PFAS concentrations found to be above 2 times the concentration found in blanks should **not** be dismissed, according to the EPA's own SOP. PFAS concentrations significantly higher than < 2X were found in both the pesticide sample Dr. Lasee sent to the EPA and the products they purchased for 4:2 FTS, 6:2 FTS, 8:2 FTS, N-EtFOSAA, PFUdA, PFDA, PFOS, PFOA, and FOSAA."

EPA Response to 1(a) and 1(b):

These claims have been addressed in previous responses to PEER's 3/4/2024 letter to the EPA Administrator[9] (see EPA response dated 4/22/2024[10]), and PEER's 5/28/2024 RFC[4] (see EPA response dated 9/24/2024[2]). EPA has also shared with PEER all the records and documents associated with the analytical work for this released report through responses to PEER's FOIA requests (dated 6/15/2023, 9/12/2023).[8] There are no departures from accepted scientific practices in EPA's study. EPA has, twice, addressed the scientific basis and validity of EPA's interpretation of the background levels (sub parts-per-billion) of some PFAS that were seen during EPA's analysis of Dr. Lasee's pesticide samples in the responses to PEER on 4/22/2024 and 9/24/2024. These background levels of PFAS were detected in both laboratory blanks and sample extracts at similar levels when using EPA's method and were traced back to some PFAS contaminated lab supplies that were used during sample extraction and cleanup. Trace levels of PFAS contamination of reagents and laboratory supplies during manufacturing and storage are very common and persistent. The Analytical Chemistry Branch laboratory has since switched lab supply vendors to minimize such contamination for PFAS analysis. It is entirely possible that because Dr. Lasee's samples did not undergo the extra extraction and cleanup procedures as EPA's, his blanks did not have the same levels of PFAS contamination as the EPA's blanks, although Dr. Lasee stated in his published article that PFAS contamination was present in his solvents and laboratory supplies. Another reason is that the limit of detection of EPA's method is at least 1,000 times lower than that of Dr. Lasee's method. EPA did not detect much background PFAS in the blanks when EPA used Dr. Lasee's method because of the high limit of detection of that method and not using many reagents and lab supplies in the procedure.

In the 12/30/24 RFR, PEER for the first time informed EPA that some samples were spiked at concentrations of 1, 5 and 10 ppb of PFOS by Dr. Lasee prior to sending the samples to EPA. However, no laboratory notes documenting how the spike was done and no spike recovery data from Dr. Lasee were provided for EPA to verify the reliability of the spiking of the samples. Dr. Lasee reported PFOS detection at 3.9 ppm to 19.2 ppm levels and the dilution method has an estimated detection limit of about 0.5 ppm, he spiked his samples at 50 to 500 times lower than his limit of detection. The recommended analytical quality assurance/quality control (QA/QC) check practice is to spike several times higher than the limit of detection and to over spike the sample with analytes at above the levels they were detected, for adequate recovery of the spiked analytes. As stated in EPA's study report and in previous two responses to PEER's requests, the EPA developed method has a detection limit of 0.2 ppb and would successfully detect and measure PFOS (or other PFAS) analytes that were spiked in the samples at 1 ppb or higher. The results of the recoveries of spiked PFAS during EPA's method validations at levels ranging from 0.2 ppb to 4 ppb were >40% for all the compounds. The recovery results from concurrent spike samples at 2 ppb during the sample analysis using EPA's method were also >40%, providing further support that if the samples were spiked at 1 ppb, 5 ppb, and 10 ppb, the spiked PFAS would have been

detected.

The EPA's ACB laboratory followed the established standard operating procedures (SOP) and its quality assurance guidelines.[11] EPA's ACB laboratory is an ISO-17025 accredited laboratory and has a complete system of quality assurance procedures, guidelines, and policies in place. All the analyses performed at ACB were conducted with complete and full quality control measurements specified in the established laboratory standard operating procedures (SOPs). All the analyses, procedures, and analytical reports are completely traceable, scientifically defensible, and meet ISO-17025 accreditation requirements and standards.

PEER Claim 1(c). "It is also of note that in "SOP No. ACB-004 R 3.1 PROJECT B23-05c – PFAS in Pesticide Products-Method Validation and Sample Analysis" the lack of peer review of the results (Note N4 in the document) was mentioned and not addressed. Dr. Yaorong Qian, who was primary scientist involved in the project, was listed as the peer reviewer." "Given that Dr. Qian was intimately involved in the product, he is not capable of serving as a peer reviewer."

EPA Response to 1(c): All the laboratory generated data and reports are reviewed by EPA internal independent chemists (internal peer review), quality assurance officer (QAO), and by the laboratory management, as specified in the SOPs. In cases where Dr. Qian performed peer-reviews on the analytical results, as pointed out in PEER's RFR 24001A, another chemist at ACB conducted the sample analyses. Dr. Qian was not involved in any part of the sample preparation and analysis processes where he served as an independent peer reviewer.[12] In the referred case of "lack of peer review of the results (Note N4 in the document)", the referred document is a review checklist and each reviewer at ACB lists questions and reminders during the review process of the data package. Sometimes the questions and reminders on the checklist were addressed in the actual data package review but in this case the reviewer forgot to cross it off on the checklist. It has been verified that this specific question was addressed in the data review package and documented in the data package that was provided to PEER in response to PEER's previous FOIA requests (6/15/2023, 9/12/2023).[8]

PEER Claim 1(d). The response did not address the following five deficiencies:
PEER Claim 1(d)(i). "EPA falsely stated in their memo that "[n]one of the 29 PFAS compounds… was detected in any of the samples above the instrument's background

[11] SOP for Pesticide Residue Chemistry Sample Analysis, Revision 3.1, SOP No. ACB-030, March 31, 2022, Quality Assurance Project Audit Checklist (PAC) for Residue Projects, Analytical Chemistry Branch, SOP No. ACB-004 R 4.0 November 30, 2022, SOP for Auditing Laboratory Projects, SOP No. ACB-004, Revision 4, November 30, 2022, SOP for the Product Chemistry Active Ingredient Method Validation (PCAIMV) Program of the ACB, SOP No. ACB-001, Revision 4, August 17, 2023, (EPA-HQ-OPP-2025-2022)

[12] Peer Review Policy Memo, *https://www.epa.gov/scientific-leadership/memorandum-peer-review-and-peer-involvement-epa.* Peer Review Handbook, *https://www.epa.gov/scientific-leadership/peer-review-handbook-4th-edition-2015*.

levels." This is patently untrue. EPA's Sciex 6500+ LC/MSMS test found evidence of 14 PFAS, including PFOS, in the pesticides."

EPA Response to 1(d)(i): EPA's study report[7] was correctly quoted by PEER, however this statement was meant for the study conclusion following Dr. Lasee's method**.** As explained in EPA's previous two responses (4/22/2024[10] and 9/24/2024[2]) to PEER, the detected PFAS using EPA's method were low and were detected at similar levels as in procedural blanks. ACB chemists evaluated these detects and determined that these detects were from laboratory background and laboratory contamination. They are not native to the pesticide products, as PEER asserted. Treating these detects as background noise and laboratory contamination is consistent with the commonly accepted scientific practices and principles.

PEER Claim 1(d)(ii). "EPA deliberately omitted from its report that Dr. Lasee's method blank contained no PFAS, as it voided their argument that he had background contamination. Aliquots sent by Dr. Lasee were about 1 mL in volume, meaning EPA would not have been able to complete the extractions they claimed to have done."

EPA Response to 1(d)(ii): EPA's study report described the methods used by EPA and the analytical results of the study. EPA's study did not find any PFAS contamination in any of the samples that EPA tested as reported by Dr. Lasee. EPA's report did not discuss Dr. Lasee's method blank, because it was not the focus of EPA's report. Also, EPA did not have Dr. Lasee's method blank or any other quality control data. EPA has fully addressed this claim on 4/22/2024 in the response to PEER's letter to EPA Administrator. In fact, Dr. Lasee stated in his published article that PFAS contamination was present in his solvents and laboratory supplies.[6]

Trace levels of PFAS contamination of reagents and laboratory supplies during manufacturing and storage are very common and persistent for chemicals in this class of chemistries. EPA's method involves extraction and cleanup that used several different reagents and materials. Presence of trace amounts of PFAS contamination in some of the reagents and materials has been documented. PFAS were detected at similar low levels in procedural blanks as in pesticide samples using EPA's method, a clear indication of PFAS contamination of the reagents and materials used in the procedure. It is entirely possible that because Dr. Lasee's samples did not undergo the extra extraction and cleanup procedures as EPA's, his blanks did not have the same PFAS contamination as the EPA's blanks.

PEER Claim 1(d)(iii). "The memo states that the Analytical Chemistry Branch's (ACB's) method "involves a more intense extraction and clean up procedure to isolate PFAS compounds from the sample matrix before instrumental analysis, thus reducing matrix interference which results in better/more accurate detection limits." Yet, EPA did not

report that ACB's methods had substantial contamination. The results from the Sciex 6500+ LC/MSMS instrument, the instrument the EPA used to quantify their new method, showed background contamination for most PFAS analyzed."

EPA Response to 1(d)(iii): The EPA developed method does involve a more intense and elaborated extraction and cleanup procedure to isolate PFAS compounds from the complex sample matrix before instrument analysis. This procedure tremendously reduces matrix interference which results in better/more accurate detection and thus much lower detection limits, when compared with the dilution and analysis technique described in Dr. Lasee's published paper. The EPA developed method has a lower achievable detection limit of about 0.2 ppb, whereas the estimated detection limit of Dr. Lasee's method is about 500 ppb (0.5 ppm; estimated from the data in Dr. Lasee's published paper), which is more than 1000 times higher than that of EPA's method. The laboratory contamination from reagents and supplies encountered during the sample analysis was at sub-ppb levels near the detection limits of EPA's method. The same laboratory contaminants from reagents and supplies were encountered in procedural blanks and in samples at similar levels. The rationale and scientific basis for determining these detections of PFAS as background and laboratory contamination are consistent with the common practices of general scientific community and are documented in the laboratory notebooks and review checklist, which have been shared with PEER through PEER's FOIA requests.

PEER Claim 1(d)(iv). "EPA cited a table with all the product names, claiming it was from Dr. Lasee's paper. It was not, and in fact, Dr. Lasee had told the EPA representative in a conversation that the names of the products could not be released, and EPA had assured him (through email and their representative's words) they would not release this information without Dr. Lasee's permission."

EPA Response to 1(d)(iv): EPA's paper did include a table with names of the products tested, but EPA did not claim that the products names were from Dr. Lasee's paper. Aliquots of tested products were sent by Dr. Lasee to EPA and the product names were provided to EPA by Dr. Lasee via his email communication.[13] Dr. Qian told Dr. Lasee that EPA planned to release the test results, and all the information associated with the analysis to the public as part of the Agency's commitment to scientific transparency. When Dr. Qian shared EPA's test results with Dr Lasee and EPA's plan of releasing the report, Dr. Lasee never raised any objections to EPA releasing the information. EPA has addressed this claim in detail in the response of 4/22/2024.[10] The EPA's memo listed the names of the tested products for transparency.

[13] Email from Lasee Research & Consulting to Anne Overstreet, EPA on 5/30/2023 (EPA-HQ-OPP-2025-2022).

PEER Claim 1(d)(v). "Dr. Lasee used mass labeled internal standards for quantification as documented in his publication, but the memo implied that he did not."

EPA Response to 1(d)(v): EPA's study report only described the methods that EPA used and the results EPA generated. EPA's report did not discuss Dr. Lasee's method, it only mentioned that his method is a dilution method and EPA followed his method for the analysis. EPA's report described the method EPA used in detail for transparency and for the validity of the method. The study report (EPA memo) does not state nor imply that Dr. Lasee did not use labeled internal standards for quantification.

2. PEER Claims EPA Ignored the Identified Violation of Procedures for Maximizing Information Quality

PEER claims that "EPA violated its own Information Quality Guidelines for an "Agency-Quality System" to ensure that EPA organizations maximize the quality of environmental information. Specifically, EPA engaged in no external peer review. It circumvented all of the steps in the agency's "Action Development Process (ADP)." It conducted no pre-dissemination review. Finally, it did not employ any integrated error correction process."

EPA Response to 2: EPA undertakes peer review in accordance with Agency policies, including the EPA Peer Review Policy and EPA Peer Review Handbook. EPA's Peer Review Policy establishes a general policy of peer review for scientifically and technically based work products, including economic and social science products, that are intended to inform Agency decisions. EPA's Peer Review Handbook further identifies scientific and technical work products that will have or do have a clear and substantial impact on important public policies or private-sector decisions as "influential scientific information" subject to peer review unless they are exempt from peer review or peer review is otherwise not necessary or is waived/deferred (see Handbook Sections 3.2 and 3.3). This study is not a work product or "influential scientific information" that would generally undergo external peer review pursuant to EPA's Peer Review Policy and Peer Review Handbook. For example, the study does not establish a significant precedent, model or methodology; have an annual effect on the economy of $100 million or more or adversely affect the economy in a material way; address significant controversial issues; or involve significant investment of agency resources. Rather, the study is a routine verification study to screen for and quantify the potential presence of 29 PFAS compounds that might be present in tested products and to verify the presence of PFOS as reported by Lasee *et al*. in these pesticide products. These types of routine verification studies do not typically undergo external scientific peer reviews. However, the study and its findings did undergo full internal QA review, internal scientific review, and management review.

EPA's IQG identifies classes of "influential information" that, to the extent they contain scientific, financial, or statistical information, should adhere to a rigorous standard of quality (See IQG Section 6.2). "Influential information" includes major work products undergoing peer review as called for under EPA's Peer Review Policy as well as other classes of information. As explained above, EPA's study in question on whether the ten pesticide products were contaminated with PFAS was a simple data verification that is not a work product subject to peer review pursuant to EPA's Peer Review Policy. The study also is not information disseminated in support of top Agency actions; does not have the potential to result in major cross-Agency or cross-media policies; is not highly controversial; is not disseminated in support of Economically Significant actions as defined in Executive Order 12866; and does not otherwise have a clear and substantial impact on important public policies or private sector decisions. Thus, EPA did not identify or consider the study to be "influential information" for purposes of the IQG.

All the activities related to the study and the review were fully documented. The release of the study report on the verification of procedures for possible PFAS contamination in pesticide products are consistent with EPA's scientific integrity and quality assurance guidelines and policies. The verification analysis was not subject to the ADP because the study does not fall within the scope of actions covered by EPA's ADP.

3. PEER Claims EPA Improperly Failed to Apply the Standard of Review for Influential Information

PEER Claim 3(a). PEER considered the challenged material as influential scientific information. The EPA Guidelines specify that influential material is subject to a higher degree of quality as well as a "higher degree of transparency about data and methods."

PEER Claim 3(b). In response, AA Freedhoff's letter, without explanation stated: "The EPA has also determined that the data generated in the cited lab report was not part of rulemaking activity or support for a rulemaking activity and are not an 'influential product' as asserted by the requestor for the purposes of external peer review."

PEER Claim 3(c). "Scientific material need not be part of formal rulemaking to be considered influential. The test is the importance of the information."

PEER Claim 3(d). PEER states, "under EPA's Information Quality Guidelines the influential classification is supposed to trigger a higher level of scrutiny and transparency. AA Freedhoff's cursory conclusion that this material was not influential can be read as a tacit admission that the challenged material does not attain this higher level of quality assurance."

EPA Response to 3(a)-3(d): See EPA Response 2. EPA's IQG identifies classes of "influential information" that, to the extent they contain scientific, financial, or

statistical information, should adhere to a rigorous standard of quality (See IQG Section 6.2). However, EPA does not identify or consider the study in question on whether the ten pesticide products were contaminated with PFOS (and PFAS) to be "influential information" for purposes of the IQG; rather, EPA considers the study to be verification of a claim of contamination of registered pesticide products. Dr. Lasee's publication that PFOS was detected at 3.9 ppm to 19.2 ppm in some pesticide products was widely available to public through a peer reviewed publication.[6] EPA's study was aimed at verifying if those pesticide products indeed contained PFOS at the reported high levels. EPA's study did not find any PFAS, including PFOS, in those pesticide products other than what came from laboratory chemical and supply contamination. Dr Lasse also sought independent verification of PFAS in samples from other laboratories which did not replicate his results either. Dr. Lasee informed EPA that he had sent a request to the journal (Journal of Hazardous Materials Letters) to retract his publication. To our knowledge the paper has not been retracted, and his publication is still available on the journal's website (https:// www.sciencedirect.com/journal/journal-of-hazardous-materials-letters) at this time. Releasing EPA's study results to public is the best way to share the full information on the PFOS contamination issue in pesticide products as reported by Dr. Lasee.

To address PEER's repeated complaints on these issues, EPA wants to point out that EPA's "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency" states that EPA uses a graded approach to establish the appropriate quality of information products based on the intended use of the information and the resources available. Further, this study and its findings have gone through complete and thorough QA review, scientific reviews and management reviews. All the activities related to the study and the review were fully documented and shared previously with PEER as part of responses to prior FOIA requests.

4. PEER Claims EPA Did Not Address Threat to Public Health Caused by EPA's Violations

PEER Claims "AA Freedhoff's response also did not address public health implications flowing from this material. In this instance" (*PEER claims*), "the public health implications are profound."

EPA Response to 4: The potential impact of PFAS on environmental and human health is of a great concern of EPA. EPA takes measurements and develops methods to measure and address possible PFAS contamination. ACB's efforts in testing and verifying if the registered pesticide products are contaminated with PFOS (and PFAS) were part of a response[7] to peer reviewed publication.[6] The ACB laboratory did not detect any PFAS native to the tested samples above their methods' lowest limit of detection (0.2 ppb). Low levels (sub parts-per-billion (ppb)) of some PFAS commonly seen in laboratory background were detected in sample extracts using EPA's method and were attributed

to contamination of some lab supplies used during sample extraction and cleanup. Furthermore, Dr. Lasee's two other collaborating laboratories also did not detect any PFAS compounds in those pesticide products that Dr. Lasee supplied. As such, ACB's lack of findings of PFAS suggests there is no threat to public health from PFAS in those pesticide products at this time. No further action is warranted on this issue of PFAS contamination of pesticide products.

Conclusion

The Executive Panel examined all the scientific and technical questions that PEER raised in this request for reconsideration and after careful consideration found no inconsistencies with EPA's Information Quality Guidelines.

As a result, EPA is denying your RFR.

EPA remains committed to the Information Quality Guidelines maximizing the quality, integrity, objectivity, and reproducibility of information we disseminate to the public.

Thank you for your interest in EPA's information quality.

Sincerely,

JON FARMER

Digitally signed by JON FARMER
Date: 2025.12.16 10:19:57 -05'00'

Carter Farmer, Chief Information Officer