



OFFICE OF THE CHIEF INFORMATION OFFICER

WASHINGTON, D.C. 20460

September 9, 2026

Ms. Heather J. Blankinship
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Dear Ms. Blankinship,

This letter is in response to your Request for Reconsideration (RFR),¹ received by the U.S. Environmental Protection Agency on June 12, 2025, which was assigned RFR #23001A for tracking purposes. Your RFR requests that the Agency reconsider its August 15, 2023, denial¹ of your Request for Correction (RFC) 23001¹ under the EPA's Information Quality Guidelines (IQG).²

The appeal process is designed as an independent evaluation of whether the initial response by the technical experts addressed the issues raised. To that end, OMB M-19-15's Implementation Update 4.5 advises agencies not to select the same individuals who were involved in the initial response to the request for correction to also review a subsequent appeal. Therefore, in accordance with EPA's IQG, a three-member executive panel met on December 4, 2025, to review your request and the information you provided. The executive panel was comprised of the EPA Science Advisor/Acting Associate Administrator for the Office of Applied Science and Environmental Solutions, the Chief Information Officer, and the Acting Chief Economist in the Office of Policy and Regulatory Management. The 3-member executive panel was chaired by the Chief Information Officer. The panel determined that EPA's denial of the RFC 23001 was based on sound reasoning.

EPA is denying the RFR because the issues that were raised in the RFC overlap with comments and submissions received and addressed in public comment opportunities.³ The NMP Producers Groups' comments were submitted and considered in the context of the TSCA Existing Chemical Risk Evaluation process, as appropriate. In addition to written comments submitted during the public comment period, the NMP Producers Group provided an oral statement during the Science Advisory Committee on Chemicals (SACC) meeting. Therefore, the issues raised were already addressed and were integrated

¹ <https://www.epa.gov/quality/rfc-23001-rfr-23001a-tsca-risk-evaluation-n-methylpyrrolidone-nmp>

² <https://www.epa.gov/quality/information-quality-guidelines-iqg>

³ See pp 97-98; 104-107; 192-196. https://www.epa.gov/sites/default/files/2020-12/documents/2_summary_of_external_peer_review_and_public_comments_and_disposition_for_n-methylpyrrolidone_response_to_support_risk_evaluation_for_nmp.pdf

into the TSCA Existing Chemical Risk Evaluation process for NMP in which a 60-day public comment period (with an extra two-week extension) on the draft risk evaluation was used to facilitate public comment on the draft risk evaluation. The NMP Producers Group submitted studies which were reviewed in response to previous public comments received, see Risk Evaluation for n-Methylpyrrolidone (NMP), Appendix I⁴ and Final Risk Evaluation for NMP Systematic Review Supplemental File.⁵ The NMP Producers Groups' comments were also submitted in the context of the TSCA Existing Chemical Risk Management process for NMP and are under consideration. EPA concluded that the public comment process for the TSCA Existing Chemical Risk Evaluation for NMP is the appropriate forum for the issues raised in the RFC. While the 2023 review provides novel analysis of previously available data, the information from the studies underlying that analysis was considered in the 2020 risk evaluation, as appropriate.

Furthermore, EPA's IQG recommend requesters submit their RFR within 90 days of the EPA decision on the RFC. If the requester submits their RFR after 90 days, EPA's IQG recommend including an explanation of why the request should be considered at the later time. EPA received your RFC on May 5, 2023, and issued a response letter on August 15, 2023. The RFR was submitted on June 12, 2025, almost two years after EPA's denial of the RFC.

In conclusion, EPA is denying the RFR.

Nonetheless EPA appreciates the engagement and would like to acknowledge the comments provided. As noted in EPA's denial of the RFC, a key component of the TSCA Existing Chemical Risk Evaluation process is the iterative public comment opportunities that are provided throughout each stage of the process.

EPA remains committed to the Information Quality Guidelines for 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,

 Digitally signed by JENNIFER CAMPBELL
Date: 2026.09.09 18:18:41 -04'00'

Jennie Campbell, Acting Chief Information Officer

⁴ See Appendix I, pp 525-531. https://www.epa.gov/sites/default/files/2020-12/documents/1_risk_evaluation_for_n-methylpyrrolidone_nmp_casrn_872-50-4.pdf

⁵ See pp 74-80. https://www.epa.gov/sites/default/files/2020-12/documents/9_nmp_sr_supplemental_file_data_quality_evaluation_of_human_health_hazard_studies_animal_and_in_vitro_studies.pdf