

As Arsenic Science Task Force

November 30, 2013

Hon. Michael S. Regan, Administrator
United States Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: IRIS Program Assessment of Inorganic Arsenic (EPA-HQ-ORD-2012-0830): Request
for Reconsideration of Decision to Deny Extension of 60-day Public Comment Period

Dear Administrator Regan:


The Arsenic Science Task Force (ASTF) and the organizations listed below respectfully request that you reconsider the decision by EPA's Office of Research and Development (ORD) to deny its timely and reasonable request to extend the public comment period on the draft IRIS program assessment of inorganic arsenic. Extension requests were submitted by ASTF and five other stakeholder organizations shortly after the draft assessment was noticed on October 17. The decision to deny any extension was made on November 21 (email attached), with less than a month remaining in the public comment period. This unprecedented decision *will* deprive the agency of important information necessary to develop a reliable, scientifically sound assessment. For this reason, we request that you reconsider the decision by ORD and grant the requested extension of 120 days.

The extension request submitted by ASTF (attached) points out that the draft assessment occupies over 600 pages with supporting materials and took EPA over a decade to complete. The assessment takes a statistics-based approach and is selective in which portions of the large body of data on inorganic arsenic were considered. During the development of the assessment, this information was kept confidential, so external stakeholders could not prepare in advance.

Although we have been diligently working since the draft was released, it will not be possible for stakeholders outside of EPA to provide comprehensive comments within the current 60-day period. This means EPA will be deprived of important input in the development of the assessment. Further, this arbitrarily abbreviated comment period contributes to the impression that the IRIS program has no real interest in considering input from stakeholders outside the federal government, thereby minimizing potentially contrary viewpoints that being expressed in the record.

ASTF therefore requests that you reconsider the denial of any extension and extend the comment period an additional 120 days, as requested in our letter of November 2.

Sincerely,



Seth Goldberg, Chair
Arsenic Science Task Force

American Chemistry Council Center for Biocide Chemistries	Arsenical Wood Preservative Task Force	
Drexel Chemical Company	Luxembourg-Pamol, Inc.	Treated Wood Council
The Fertilizer Institute	National Cotton Council	USA Rice
Juice Products Association	National Mining Association	Wood Preservative Science Council
		Freeport McMoRan Inc.

cc: Chris Frey
Wayne Cascio