



Center for Regulatory Effectiveness

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October 13, 2009

Mr. Stephen A. Owens
Assistant Administrator
Office of Prevention, Pesticides and Toxic Substances
U. S. Environmental Protection Agency
Washington, D.C. 20460

RE: EDSP Disclosures

Dear Assistant Administrator Owens,

On behalf of the Center for Regulatory Effectiveness, I request that EPA provide to the public several essential components of EPA's Endocrine Disruptor Screening Program ("EDSP"). These components are

- 1) EPA's response to all comments on the EDSP and its Information Collection Request ("ICR"), including by way of example and without limitation all EPA responses to OMB's comments on the ICR, and EPA's responses to all comments on the Tier 1 assays;
- 2) EPA's final test protocols for the Tier 1 assays; and
- 3) All EPA signed Quality Assurance Project Plans ("QAPP") for the EDSP, including by way of example and without limitation
 - a) EPA's QAPP for development and validation of the Tier 1 assays;
 - b) EPA's QAPP for development and validation of the Tier 2 assays;
 - c) EPA's QAPP for making Other Scientifically Relevant Information ("OSRI") determinations; and
 - d) EPA's QAPP for making weight of evidence determinations as to who has to go to Tier 2 testing.

Please see <http://www.epa.gov/QUALITY/faq6.html> for background discussion of the QAPP requirements for the EDSP.

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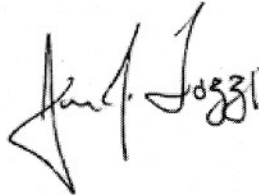
4) We also request public disclosure of EPA's Information Quality Act ("IQA") pre-dissemination review process and record for

- a) EPA's development and validation of the EDSP Tier 2 assays;
- b) EPA's Other Scientifically Relevant Information ("OSRI") EDSP determinations; and
- c) EPA's weight of evidence determinations as to who has to go to EDSP Tier 2 testing.

We request that you provide all the information identified above to the undersigned. Upon receipt, we will post it CRE's publicly accessible website, www.thecre.com.

We also request that EPA post all the information identified above on EPA's publicly accessible EDSP websites. EPA has repeatedly promised to operate in a transparent manner. Publicly posting these documents is necessary to fulfill these promises. We believe that disclosing these documents is also necessary to comply with OMB's Transparency Directive that will be issued in the next few weeks.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jim J. Tozzi". The signature is stylized with a large initial "J" and "T".

Jim J. Tozzi, PhD
Member, Board of Advisors

CC: Frank Sanders, Director, EPA Office of Science Coordination and Policy