

CHAMBER OF COMMERCE  
OF THE  
UNITED STATES OF AMERICA

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ENVIRONMENT, TECHNOLOGY &  
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February 10, 2006

Ms. Kathleen White  
Designated Federal Officer  
EPA SAB Staff Office (1400F)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Notification of Three Public Teleconferences and a Meeting of the  
Science Advisory Board EPI Suite Review Panel**

Dear Ms. White:

The U.S. Chamber of Commerce, the world's largest business federation representing more than three million businesses and organizations of every size, sector, and region, is pleased to provide this response to the call for comments<sup>1</sup> about the forthcoming public teleconferences and a meeting of the Science Advisory Board's EPI Suite Review Panel (ESRP).

The U.S. Chamber requests that all members of the ESRP be provided with both this letter and complete copies of the enclosed documents<sup>2</sup>, which are submitted as part of these comments.

Many of the U.S. Chamber's members are affected by or engaged in activities involving the use of databases and models disseminated by the U.S. Environmental Protection Agency (EPA), or whose distribution EPA sponsors, inclusive of the EPI Suite. As such, the U.S. Chamber has a significant interest in this issue.

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<sup>1</sup> Science Advisory Board Staff Office; "Notification of Three Public Teleconferences and a Meeting of the Science Advisory Board EPI Suite Review Panel," *Federal Register*, 71(21), 5317-5318, February 1, 2006.

<sup>2</sup> The enclosed documents include: (i) James Pontolillo and Robert P. Eaganhouse, *The Search for Reliable Aqueous Solubility ( $S_w$ ) and Octanol-Water Partition Coefficient ( $K_{ow}$ ) Data for Hydrophobic Organic Compounds: DDT and DDE as a Case Study*, Water-Resources Investigations Report 01-4201, U.S. Geological Survey, Reston, VA 2001; (ii) Igor Linkov, Michael R. Ames, Edmund A. C. Crouch, and F. Kyle Satterstrom, "Uncertainty in Octanol-Water Partition Coefficient: Implications for Risk Assessment and Remedial Costs," *Environmental Science & Technology* 39(18), 6017-6922 (2005); (iii) Urs Schenker, Matthew Macleod, Martin Scheringer, and Konrad Hungerbühler, "Improving Data Quality for Environmental Fate Models: A Least-Squares Adjustment Procedure for Harmonizing Physicochemical Properties of Organic Compounds," *Environmental Science & Technology* 39(21), 8434-8441 (2005); and (iv) all documentation pertaining to the Information Quality correction request [RFC 04019], as well as all documentation pertaining to Information Quality request for reconsideration [RFR 04019A].

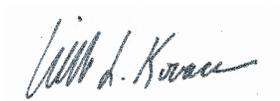
Ms. Kathleen White  
February 10, 2006  
Page 2 of 2

The enclosed documents are germane to the ESRP's forthcoming activities because these materials address concerns related to the EPI Suite. Moreover, the documents raise important considerations generally related to how the quality, objectivity, reliability, integrity, and utility of fundamental physical-chemical data may be improved.

The U.S. Chamber suggests that all members of the ESRP could benefit further in understanding issues related to data reliability if they were briefed on the Information Quality Act (IQA) by someone knowledgeable about the requirements of the IQA, such as a representative from the Office of Information and Regulatory Affairs at the Office of Management and Budget. This would enable the ESRP panel members to more completely understand the requirements of the IQA as it relates to the matter before the panel. The U.S. Chamber also suggests that it would be very helpful to members of the ESRP if they were briefed by some knowledgeable individual, such as Dr. George Gray, Assistant Administrator of EPA's Office of Research and Development, concerning how understanding and treatment of physical-chemical data uncertainties may be improved and how this understanding and outcomes related to improving the treatment of data uncertainties can best be communicated to all stakeholders, including the public.

The U.S. Chamber thanks you for the opportunity to comment on the forthcoming public teleconferences and meeting of the Science Advisory Board's ESRP. Please feel free to contact me if you have any questions or require additional information.

Sincerely,



William L. Kovacs

Enclosures