

From: Charles Grizzle [mailto:grizzle@grizzleco.com]
Sent: Wednesday, December 10, 2014 5:35 PM
To: Olden, Kenneth
Cc: Vandenberg, John
Subject: Re: Meeting request

Dr. Olden:

Thank you for agreeing to meet with members of the Arsenic Science Task Force (ASTF) in January—ideally in the first part of the month—to discuss our ongoing concerns with the process for development of the draft IRIS assessment of inorganic arsenic. In response to your request that you be provided with expected outcomes from such a meeting, the ASTF offers the following:

First, we don't find total reliance on the IRIS website for information on the status of the arsenic assessment to be satisfactory, as it only informs us without any opportunity for feedback or discussion. The congressional mandate for the assessment of inorganic arsenic for a combined assessment of cancer and non-cancer endpoints and for the peer review to be conducted by the NAS seems to make this a bit of a special case. With that in mind, we believe a continuing robust stakeholder dialogue is needed and respectfully suggest that a meeting with you to air these issues in person will be beneficial. Since your appointment as Director of NCEA, you have espoused increased transparency of the IRIS process as one of the major changes you will make to the program.

Second, with respect to the arsenic assessment, we are concerned that the agency's plans have changed without notice. The arsenic-specific webinars that were formerly described to us as an expected part of the development of the arsenic assessment -- and public involvement in that effort -- now appear to be at high risk of cancellation. We would like to understand the reasons for this change, and how the agency plans to achieve the promised improvements in the IRIS process, particularly with respect to the arsenic assessment. We would hope to get an understanding of how and when opportunities for public participation will occur. If, as your letter indicates, you may be withdrawing your previous commitment to conduct arsenic-specific webinars, how will recent scientific developments be discussed and evaluated?

Third, as pointed out in our letter of October 9, we are still awaiting the posting of the remaining draft development materials that were not included in the posting of the original materials in March. When might we see the remaining materials? While your reply says your staff has completed an extensive literature search, we would like to understand why some studies were omitted in the original draft development materials or have been designated as subject to later consideration. We would like to discuss with you the specific steps the agency will take to ensure all current, relevant work is considered in the review and to understand when we will see an amended list of studies. Perhaps those omitted studies will be included when the remaining draft development materials are made available.

Fourth, now that you have advised us that the timeline for development and posting of the draft arsenic assessment has been delayed due to staffing changes, we would like to have an understanding of the likely revised timeline. We assume the date for invocation of the Stopping Rules for the arsenic assessment has also been extended. What is the new date?

Finally, we provided you with a very brief description of some of the scientific work in process and hereby reiterate our offer to provide you a more in depth briefing of the focus of those studies and the anticipated outcomes.

We look forward to meeting with you next month.

Thanks and best regards,

Charlie

On Dec 2, 2014, at 4:19 PM, Olden, Kenneth wrote:

Charlie:

The manager in charge of the Arsenic assessment moved to another unit within the EPA, so we are having to slow down the assessment until we can get a new manager in place. So, there is no urgency to have the meeting in December. Furthermore, there is no time on my schedule for such a meeting in December. It is not clear to me why a meeting would be helpful, but if you still want a meeting; I told my executive assistant to see if she could find a date in January 2015. In the meantime, can you indicate what outcome you expect from such a meeting.

Sincerely, Ken

Charles L. Grizzle
Chairman
The Grizzle Company
1701 Pennsylvania Ave, NW
Suite 300
Washington, D.C. 20006
202-234-2101 (main)
202-349-1468 (direct)
202-253-9944 (mobile)