



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

March 27, 2003

Scott Ferson, Ph.D.
Applied Biomathematics
100 North Country Road
Setauket, NY 11733

Dear Dr. Ferson:

Thank you for agreeing to conduct an independent "letter peer review" of the U.S. Environmental Protection Agency's (USEPA's) and U.S. Consumer Product Safety Commission's (CPSC's) proposed research effort related to Chromated Copper Arsenate (CCA)-treated wood. Specifically, this research, which is being conducted by USEPA's Office of Research and Development (ORD) in collaboration with the Office of Pesticide Programs (OPP) and the CPSC, is intended to develop data on the effectiveness of sealants in preventing, or reducing, the amount of dislodgeable arsenic residues on CCA-treated wood surfaces. The data developed in this effort will be critical in aiding the USEPA and the CPSC in developing guidance to the public relative to reducing potential exposure to arsenic from existing CCA-treated wood structures.

We are pursuing comments from individual scientists on the proposed research protocol in order to ensure that this study is conducted using the best scientific means. Recognizing your expertise, the Agency requests your review of the enclosed research protocol documents:

"Evaluation of The Effectiveness of Coatings In Reducing Potentially Dislodgeable Arsenic From CCA Treated Wood", Quality Assurance Project Plan, Category II/Sampling and Analysis, Draft - Revision 1, U.S. Environmental Protection Agency, Air Pollution Prevention and Control Division, March 21, 2003.

“Screening/Selection of Coatings for Reducing Potentially Dislodgeable Arsenic From CCA Treated Wood”, Quality Assurance Project Plan, Category III/Sampling and Analysis, Draft - Revision 1, U.S. Environmental Protection Agency, Air Pollution Prevention and Control Division, March 21, 2003.

We ask that when performing your review, you specifically address those questions presented in the attachment entitled, “Questions for External Peer Reviewers”. A short background is presented with each question which provides some context. Please also feel free to provide any additional comments that you may consider to be beneficial to the Agency. When providing comments, please be sure to include your name, title, affiliation, and date of review.

If you have any questions or need additional information, please contact Dr. Nader Elkassabany, the Project Officer for this effort.

In an effort to aid you in your peer review, we are providing, as an attachment, testimony given by OPP recently at a CPSC public hearing regarding a petition to ban the sale CCA-treated wood for use in play structures. Additionally, should you have questions on the methodology developed by the Agency on conducting a probabilistic risk assessment, you may refer to the website,

<http://www.epa.gov/scipoly/sap/2002/index.htm>

which describes the Agency’s probabilistic model [Stochastic Human Exposure and Dose Simulation Model (SHEDS)] and the questions and responses posed to and received from the USEPA’s Scientific Advisory Panel.

In closing, your completed review with comments (hard copy) should be forwarded to:¹

Dr. Nader Elkassabany
USEPA Project Officer
Anticrobials Division (7510C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

¹ Please email your comments as well to: elkassabany.nader@epa.gov

We request that you complete your review and forward your comments to us no later than April 15, 2003. I would again like to thank you in advance for your willingness to review and provide comments on the proposed protocol. Please feel free to direct any questions you may have to Dr. Elkassabany at 703-308-8783.

Sincerely,

Jack E. Housenger, Acting Associate Director
Antimicrobials Division (7510C)
Office of Pesticide Programs

Attachments