



ACQUISITION AND
TECHNOLOGY

OFFICE OF THE UNDER SECRETARY OF DEFENSE

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FEB. 11 2002

Honorable Henry L. Longest II
Acting Assistant Administrator
Office of Research and Development
US Environmental Protection Agency
Ariel Rios Building, Mail Code 8101R
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Longest:

The Department of Defense (DoD) requests a sixty-day extension of the public comment period for the Perchlorate Environmental Contamination: Toxicological Review and Risk Characterization, External Review Draft, to April 22, 2002, followed no sooner than thirty days later by the external peer review workshop (currently scheduled for the 5 and 6 March 2002). The current tight schedule allows EPA only two weeks (i.e., from 19 February to 5 March) to consolidate public comments and provide them to the peer reviewers. The peer reviewers must have adequate time, after receiving these comments, to analyze the complex information and comments in order to be in a position to reach a conclusion.

DoD requests a comment period extension for two reasons. First, the 534-page draft document has several elements that depart from conventional toxicological methodologies. Consequently, our scientists need additional time to review and analyze the new approaches and accompanying data. DoD worked with Environmental Protection Agency (EPA), but our scientists have not had an opportunity to review the new EPA methodologies or to analyze recently received data using either the more conventional or new methodologies. Second, considering the sheer volume and complexity of the draft document, DoD and other interested parties need additional time to adequately review the document's findings with related data. The additional time will allow all parties to provide accurate, meaningful comments and ensure that the peer review panel has the benefit of relevant work.

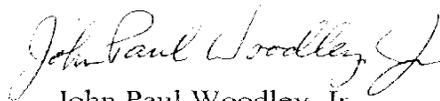
As you are aware, DoD, EPA, and other stakeholders worked together since January of 1998 under the auspices of the Inter-Agency Perchlorate Steering Committee to develop and implement a process to define and clarify the potential risk of perchlorate contamination in the environment. The EPA participated in the preparation of the study protocol, and the delivery of this data to EPA preceded the current EPA position. These studies were conducted with the explicit purpose of supporting this assessment. It is in



the national interest to base EPA decisions for human health and the environment on credible science. An extension of the comment period and corresponding peer review is necessary to ensure that a final decision on perchlorate is based upon adequate analysis.

If you have any questions, please call me at (703) 697-8080 or your staff can contact our point of contact, Mr. David Carrillo, HQ USAF/ILEVR, at (703) 604-0561 or e-mail: david.carrillo@pentagon.af.mil.

Very truly yours,



John Paul Woodley, Jr.
Assistant Deputy Under Secretary of Defense
(Environment)

cc:

Ms. Linda Fischer, EPA Deputy Administrator
Dr. William H. Farland, EPA-ORD
Ms. Annie M. Jarabek, EPA-NCEA
EPA Perchlorate Peer Review Docket
Ms. Olga Dominguez, NASA
Mr. Mark Schoppet, NASA
Mr. Paul Noe, OMB
Mr. Art Fraas, OMB
Mr. Raymond J. Fatz, Army
Mr. Donald Schregardus, Navy
Ms. Maureen T. Koetz, Air Force
Mr. Jan Reitman, DLA