



# United States Department of the Interior

U.S. GEOLOGICAL SURVEY  
Reston, Virginia 20192

July 18, 2014

In Reply Refer To:  
Mail Stop 150

Anne LeHuray  
Executive Director, Pavement Coatings Technology Council  
2308 Mount Vernon Avenue, Suite 134  
Alexandria, Virginia 22301  
[alehuray@pavementcouncil.org](mailto:alehuray@pavementcouncil.org)

Dear Dr. LeHuray:

This relates to the September 18, 2013, email submitted to the U.S. Geological Survey (USGS) by Leonard S. Kurfirst of Surdyk & Baker on behalf of the Pavement Coatings Technology Council (PCTC) regarding a request for correction of information about the journal publication titled "Cancer Risk from Incidental Ingestion Exposures to PAHs Associated with Coal-Tar-Sealed Pavement" and a related USGS news release and blog posting. Information related to the request may be viewed on our Web page at [http://www.usgs.gov/info\\_qual/cancer\\_risk\\_coal-tar-sealed\\_pavement.html](http://www.usgs.gov/info_qual/cancer_risk_coal-tar-sealed_pavement.html). In a June 26, 2014 email, Mr. Kurfirst identified you the new point of contact for any future communications from the USGS related to this request.

The attached provides the USGS response to the request, which I have reviewed and find to be comprehensive in relation to the Information Quality Act (IQA) requirements. As stated in the attachment, we find the journal publication to which you referred in your request to be technically correct, unbiased, and objective. Therefore, no corrective action will be taken to retract or remove the publication. In accordance with this decision about the publication, the USGS Top Story blog posting, which is based on the journal article, will not be removed from the USGS Web site. Regarding the press release, as stated in the attachment, news releases are exempt from the IQA process and therefore it will not be removed from the USGS Web site.

The right to appeal is available if there is any dissatisfaction with our decision regarding this request. The appeal should be addressed to the Director, USGS, and it must be submitted to the USGS (via email to [InfoQual@usgs.gov](mailto:InfoQual@usgs.gov)) within 21 calendar days of the date of this final USGS response. Additional information on the procedure for submitting an appeal is found on the USGS Information Quality Guidelines Web site at [http://www.usgs.gov/info\\_qual/](http://www.usgs.gov/info_qual/), under section IV, 4.

Thank you for your interest in these products.

Sincerely,

William H. Werkheiser  
Associate Director for Water

Attachment

**Attachment: USGS Response to IQA Request for Information Correction**  
**([http://www.usgs.gov/info\\_qual/cancer\\_risk\\_coal-tar-sealed\\_pavement.html](http://www.usgs.gov/info_qual/cancer_risk_coal-tar-sealed_pavement.html))**

This request for correction, submitted on behalf of the Pavement Coatings Technology Council (PCTC), focuses on the USGS press release and the USGS Top Story resulting from the journal publication "Cancer risk from incidental ingestion exposures to PAHs associated with coal-tar sealed pavement," also cited in the request. The article was published in the journal *Environmental Science and Technology*, volume 47, in 2013. Dr. Spencer Williams, a toxicologist at the Center for Reservoir and Aquatic Systems Research (Baylor University) was the senior author of the journal article and lead scientist conducting the risk assessment effort on which the article is based. Drs. Barbara Mahler and Peter Van Metre (USGS Texas Water Science Center) coauthored the article and provided data from their field studies that were used in the risk assessment.

**PCTC Corrective Actions Requested:**

- 1) The press release and top story must be removed from the USGS website;
- 2) The risk assessment must be retracted or withdrawn; and
- 3) Drs. Mahler and Van Metre must be restricted from participating in future USGS coal-tar-sealant presentations and research.

**USGS Response:**

This request for correction primarily concerns the assumptions used in the risk assessment and subsequent conclusions published in the journal article. The specific issues raised in the request were similar to those raised by Dr. Brian Magee and Janet Keating-Connolly (ARCADIS) in the form of a commentary on the article submitted to the Journal editor. The review comments in Exhibit A of the IQA were summarized as a Comment to *Environmental Science and Technology* (Magee and Keating-Connolly). We delayed responding to this request for correction in order to allow the author of the article to respond formally through the Journal and preserve the integrity of the scientific discourse. A Response to Comment has been published by the Journal (Williams, Mahler, and Van Metre). Both the Comment and Response to Comment are listed in the references below and are available at the journal's Web page: <http://pubs.acs.org/doi/abs/10.1021/es303371t>. The USGS concurs with the authors' published response and incorporates it by reference here.

Prior to publication, the draft manuscript for the journal article by Williams and others (2013) was identified by the USGS as containing potentially "influential scientific information." Accordingly, a peer review plan and peer review summary documentation was publicly posted on the USGS Peer Review Agenda Web site (refer to [http://www.usgs.gov/peer\\_review/docs/pr\\_results\\_summary\\_coal\\_tar\\_sealants\\_and\\_cancer\\_risk.pdf](http://www.usgs.gov/peer_review/docs/pr_results_summary_coal_tar_sealants_and_cancer_risk.pdf)). The peer review process was consistent with the USGS Fundamental Science Practices (FSP) requirements for a minimum of two peer reviews by qualified reviewers (<http://www.usgs.gov/usgs-manual/500/502-3.html>). Specifically for this manuscript, reviews were conducted by both the USGS and the scientific journal *Environmental Science and Technology*. The first review round was conducted by the USGS; that review used one USGS employee who was selected based on his expertise in toxicology and carcinogenicity. This reviewer was not involved in the research conducted, and had no plans for being involved in subsequent USGS work on the subject topic. The second review round was conducted by the journal; that review used four peer reviewers selected by the journal on the basis of the subject matter of the paper and the experts available in the given area. The journal maintains anonymity of these peer reviewers.

The journal's published risk calculations support the authors' conclusion that use of coal-tar-based sealants is associated with human health risks in excess of widely accepted standards, and that further investigation of exposure to PAHs associated with coal-tar based sealant is warranted. The USGS stands behind the journal publication, therefore, no corrective action to retract or withdraw it will be taken.

News or press releases are exempt from USGS Information Quality Guidelines ([http://www.usgs.gov/info\\_qual/](http://www.usgs.gov/info_qual/)) and, as such, the press release will not be removed from the Web site or discussed further in this response document.

USGS Top Stories are blog postings written in a style appropriate for helping the general public better understand complex science, rather than in a style targeted for a technical journal or other scientific publication. The information in the Top Story ([http://www.usgs.gov/blogs/features/usgs\\_top\\_story/youre-standing-on-it-health-risks-of-coal-tar-pavement-sealcoat/](http://www.usgs.gov/blogs/features/usgs_top_story/youre-standing-on-it-health-risks-of-coal-tar-pavement-sealcoat/)) was taken directly from the journal article. It received additional reviews by USGS headquarters and regional staff and the appropriate approvals to ensure consistency with USGS FSP and Communications requirements. Because the USGS stands behind the journal publication on which the Top Story is based, no corrective action will be taken to remove the Top Story from the USGS Web site.

Lastly, restricting Drs. Mahler and Van Metre from participating in future coal-tar sealant presentations or research would constitute censorship. This type of action is not a "correction of information," and thus is not in the purview of OMB's Government-wide Information Quality Guidelines. Furthermore, such an action is contrary to the mission and policies of the USGS and thus is not under consideration.

## References

Williams, E.S., Mahler, B.J., and Van Metre, P.C., 2013, "Cancer Risk from Incidental Ingestion Exposures to PAHs Associated with Coal-Tar-Sealed Pavement", *Environmental Science and Technology* 47, p. 1101-1109. (USGS Publication Warehouse Citation View: <http://pubs.er.usgs.gov/publication/70042684>.)

Magee, Brian, and Keating-Connolly, Janet, 2014, "Comment on Cancer Risk from Incidental Ingestion Exposures to PAHs Associated with Coal-Tar-Sealed Pavement", *Environmental Science and Technology* 48, p. 868-869. (<http://pubs.acs.org/doi/abs/10.1021/es404184q>)

Williams, E.S., Mahler, B.J., and Van Metre, P.C., 2014, "Response to Comment on Cancer Risk from Incidental Ingestion Exposure to PAHs Associated with Coal-Tar Sealed Pavement", *Environmental Science and Technology* 48, p. 870-871. (<http://pubs.acs.org/doi/abs/10.1021/es405078f>)