To: Nguyen, Khue[Nguyen.Khue@epa.gov]; Garber, Kristina[Garber.Kristina@epa.gov]; Panger, Melissa[Panger.Melissa@epa.gov]; Rossmeisl, Colleen[Rossmeisl.Colleen@epa.gov]
Cc: Pease, Anita[Pease.Anita@epa.gov]; Blankinship, Amy[Blankinship.Amy@epa.gov]; Villanueva, Philip[Villanueva.Philip@epa.gov]; Snyderman, Steven[Snyderman.Steven@epa.gov]; Friedman, Dana[Friedman.Dana@epa.gov]; Grable, Melissa[Grable.Melissa@epa.gov]
From: Peck, Charles
Sent: Mon 5/22/2017 11:19:42 AM
Subject: RE: follow up on CRE modeling inquiry
draft response to CRE re models qa.qc cap.docx

Attached are my suggested edits.

Chuck Peck

OPP/EFED/ERB VI

Potomac Yard South

Crystal City, VA

Room 12314

(703) 347-8064

peck.charles@epa.gov

From: Nguyen, Khue
Sent: Friday, May 19, 2017 4:43 PM
To: Garber, Kristina <Garber.Kristina@epa.gov>; Panger, Melissa <Panger.Melissa@epa.gov>; Rossmeisl, Colleen <Rossmeisl.Colleen@epa.gov>; Peck, Charles <Peck.Charles@epa.gov>
Cc: Pease, Anita <Pease.Anita@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Grable, Melissa <Grable.Melissa@epa.gov>
Subject: RE: follow up on CRE modeling inquiry

Hi all,

I went ahead and took a stab at drafting a response to CRE with the info that everyone was forwarding. Let me know what you think. I was going to respond via email to CRE, but let me know if you want a more formal response.

Khue Nguyen

Chemical Review Manager

Risk Management and Implementation Branch 1

Pesticide Re-evaluation Division

Office of Pesticide Programs, EPA

703-347-0248

Nguyen.khue@epa.gov

From: Garber, Kristina
Sent: Tuesday, April 18, 2017 1:07 PM
To: Panger, Melissa <Panger.Melissa@epa.gov>; Rossmeisl, Colleen <Rossmeisl.Colleen@epa.gov>
Cc: Peck, Charles <Peck.Charles@epa.gov>; Pease, Anita <Pease.Anita@epa.gov>; Nguyen, Khue <Nguyen.Khue@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>
Subject: RE: follow up on CRE modeling inquiry

The TIM SAP meetings were in 2001 and 2004.

VVWM used in PWC was also part of the 2004 SAP.

The basis for T-REX (i.e., use of kenaga data and food intake rates) was part of the ECOFRAM report in 1999.

(https://www.epa.gov/sites/production/files/2015-08/documents/terrreport.pdf)

From: Panger, Melissa
Sent: Tuesday, April 18, 2017 10:34 AM
To: Garber, Kristina <Garber.Kristina@epa.gov>; Rossmeisl, Colleen

<Rossmeisl.Colleen@epa.gov>
Cc: Peck, Charles <Peck.Charles@epa.gov>; Pease, Anita <Pease.Anita@epa.gov>; Nguyen, Khue <Nguyen.Khue@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>
Subject: RE: follow up on CRE modeling inquiry

The carbo SAP was in Feb. 2008.

Melissa Panger, Ph.D.

Senior Advisor, ERB2

Environmental Fate and Effects Division

Office of Pesticide Programs

USEPA

703-305-6136

panger.melissa@epa.gov

From: Garber, Kristina
Sent: Tuesday, April 18, 2017 10:21 AM
To: Rossmeisl, Colleen <Rossmeisl.Colleen@epa.gov>
Cc: Peck, Charles <Peck.Charles@epa.gov>; Pease, Anita <Pease.Anita@epa.gov>; Nguyen, Khue <Nguyen.Khue@epa.gov>; Panger, Melissa <Panger.Melissa@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>
Subject: Re: follow up on CRE modeling inquiry

Ex. 5 - Deliberative Process

I believe Ex. 5 - Deliberative Process

On Apr 18, 2017, at 9:52 AM, Rossmeisl, Colleen <Rossmeisl.Colleen@epa.gov> wrote:

I am forwarding to Kris as well as she may be able to contribute to this discussion.

From: Peck, Charles
Sent: Tuesday, April 18, 2017 8:16 AM
To: Pease, Anita <Pease.Anita@epa.gov>; Nguyen, Khue <Nguyen.Khue@epa.gov>; Rossmeisl, Colleen <Rossmeisl.Colleen@epa.gov>; Panger, Melissa <Panger.Melissa@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>
Cc: Snyderman, Steven <Snyderman.Steven@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>
Subject: RE: follow up on CRE modeling inquiry

I'm not sure. I didn't know if Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

From: Pease, Anita
Sent: Tuesday, April 18, 2017 8:07 AM
To: Peck, Charles <Peck.Charles@epa.gov>; Nguyen, Khue <Nguyen.Khue@epa.gov>; Rossmeisl, Colleen <Rossmeisl.Colleen@epa.gov>; Panger, Melissa <Panger.Melissa@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>
Cc: Snyderman, Steven <Snyderman.Steven@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>
Subject: Re: follow up on CRE modeling inquiry

Ex. 5 - Deliberative Process

you thinking?

From: Peck, Charles

Sent: Tuesday, April 18, 2017 7:49:31 AM
To: Pease, Anita; Nguyen, Khue; Rossmeisl, Colleen; Panger, Melissa; Blankinship, Amy; Villanueva, Philip
Cc: Snyderman, Steven; Friedman, Dana
Subject: RE: follow up on CRE modeling inquiry

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process ?

From: Pease, Anita
Sent: Tuesday, April 18, 2017 7:38 AM
To: Peck, Charles <Peck.Charles@epa.gov>; Nguyen, Khue <Nguyen.Khue@epa.gov>; Rossmeisl, Colleen <Rossmeisl.Colleen@epa.gov>; Panger, Melissa <Panger.Melissa@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>
Cc: Snyderman, Steven <Snyderman.Steven@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>
Subject: Re: follow up on CRE modeling inquiry

Ex. 5 - Deliberative Process

From: Peck, Charles
Sent: Tuesday, April 18, 2017 7:08:28 AM
To: Nguyen, Khue; Rossmeisl, Colleen; Panger, Melissa; Blankinship, Amy; Pease, Anita; Villanueva, Philip
Cc: Snyderman, Steven; Friedman, Dana
Subject: RE: follow up on CRE modeling inquiry

Hi Khue,

I'm pretty sure we discussed this at a previous ESA meeting, but I'm not sure any resolution as to how to address Mr. Slaughter's questions came up, as our focus was on developing the draft BEs for carbabryl and methomyl. I've copied our management on this

Ex. 5 - Deliberative Process

Chuck Peck

OPP/EFED/ERB VI

Potomac Yard South

Crystal City, VA

Room 12314

(703) 347-8064

peck.charles@epa.gov

From: Nguyen, Khue
Sent: Monday, April 17, 2017 5:01 PM
To: Peck, Charles <Peck.Charles@epa.gov>; Rossmeisl, Colleen <Rossmeisl.Colleen@epa.gov>; Panger, Melissa <Panger.Melissa@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>
Cc: Snyderman, Steven <Snyderman.Steven@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>
Subject: follow up on CRE modeling inquiry

Folks,

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process? Where are we on this? I just received a new email today from CRE.

Thanks,

Khue Nguyen

Chemical Review Manager

Risk Management and Implementation Branch 1

Pesticide Re-evaluation Division

Office of Pesticide Programs, EPA

703-347-0248

Nguyen.khue@epa.gov

From: Scott Slaughter [mailto:slaughterenator@gmail.com]
Sent: Monday, February 06, 2017 2:12 PM
To: Nguyen, Khue <Nguyen.Khue@epa.gov>
Cc: Friedman, Dana <Friedman.Dana@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Scott Slaughter <slaughterenator@gmail.com>
Subject: Re: Diazinon Effects Determination

Thanks a lot for responding to my email.

I do have a few additional questions.

First, what SAPs and other peer reviews have the OP ESA consultation models undergone? Can you give me links to all these peer reviews?

Second, in addition to the models peer reviews (if any), what other peer reviews have the ESA OP consultations undergone? Can you give me links to all these peer reviews?

Third, where is the administrative record(s) for the documentation/validation/verification of the OP ESA consultation models? This record should include EPA/FWS/NMFS' response to comments on the models. Can you give me links to this administrative record(s)?

Thanks a lot for your help.

Scott Slaughter

The Center for Regulatory Effectiveness

3017061012

On Wed, Feb 1, 2017 at 1:29 PM, Nguyen, Khue <Nguyen.Khue@epa.gov> wrote:

Hi Scott,

This response below holds true for diazinon and malathion as well. Please let us know if you have further questions.

Thanks,

Khue Nguyen

Chemical Review Manager

Risk Management and Implementation Branch 1

Pesticide Re-evaluation Division

Office of Pesticide Programs, EPA

703-347-0248

Nguyen.khue@epa.gov

From: Friedman, Dana
Sent: Wednesday, February 01, 2017 1:23 PM
To: Scott Slaughter <slaughterenator@gmail.com>
Cc: Nguyen, Khue <Nguyen.Khue@epa.gov>
Subject: RE: Chlorpyrifos Effects Determination

Hi Mr. Slaughter,

We've identified the source of the confusion being grammatical inconsistency that unfortunately, wasn't caught during our review. The response you cited is intended to read:

EPA thanks CRE for its comments on the validity of the models used in the draft BEs. The underlying models used in the draft BEs have undergone extensive peer-review by the Scientific Advisory Panel, the regulated community, and within the scientific literature. EPA does internal QA/QC of its models before using them in risk assessments. The modifications of EPA's models used in the BEs ~~are now undergoing~~ have undergone preliminary external QA/QC as a result of public comments. Errors identified within these models as part of the public comment process have been corrected in the versions released with the final BEs. EPA anticipates completing the formal QA/QC process before any regulatory decision is made regarding the pilot chemicals.

The review and modification to EPA's models however, is ongoing, given that the BEs and pending Biological Opinions (BiOps) are intended to pilot interim scientific methods for future pesticide consultations. These tools are being made available to the public during review of the BEs and BiOps, and EPA will consider any comments the public may have during this review process through finalization of the BiOps.

We are currently in the process of amending the introductory language on the Provisional Models page to reflect this clarification, and very much appreciate your bringing this oversight to our attention.

Please let me know if you have any additional questions.

Kind regards,

Dana

Dana L. Friedman

Pesticide Re-evaluation Division

Office of Pesticide Programs

U.S. Environmental Protection Agency

703-347-8827

From: Scott Slaughter [mailto:slaughterenator@gmail.com]
Sent: Tuesday, January 31, 2017 2:28 PM
To: Friedman, Dana <Friedman.Dana@epa.gov>; Scott Slaughter <slaughterenator@gmail.com>
Subject: Chlorpyrifos Effects Determination

EPA's response to the Center for Regulatory Effectiveness' comments states in part:

"The modifications of EPA's models used in the BEs are now undergoing external QA/QC as a result of public comments."

Page 15, at https://www3.epa.gov/pesticides/nas/final/response-to-comments.pdf

Please tell me whom I can contact, or where online I can go, in order to learn the details of the referenced "external QA/QC."

Thank you.

Scott Slaughter

The Center for Regulatory Effectiveness

3017061012 or

2022652383