To: Echeverria, Marietta[Echeverria.Marietta@epa.gov]
From: Pease, Anita
Sent: Mon 5/22/2017 7:13:41 PM
Subject: FW: Diazinon Effects Determination

FYI - Looks like Khue already responded to CRE re: QA/QC of the ESA models.

From: Nguyen, Khue
Sent: Monday, May 22, 2017 1:53 PM
To: Scott Slaughter <slaughterenator@gmail.com>
Cc: Friedman, Dana <Friedman.Dana@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Peck, Charles <Peck.Charles@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>; Pease, Anita <Pease.Anita@epa.gov>
Subject: RE: Diazinon Effects Determination

Hi Scott,

The provisional ESA consultation models are undergoing QA/QC and EPA intends to finish the QA/QC of all the ESA tools by the end of 2017 with the release of the final Biological Opinions for the first three pilot chemicals (chlorpyrifos, diazinon, and malathion).

Some of the models have already been reviewed through prior Science Advisory Panels (SAPs). The TIM model has been through 3 SAPs: in 2001, in 2004, and in 2008 (for carbofuran). Here are the links to the meeting materials for each SAP:

2001 SAP: https://archive.epa.gov/scipoly/sap/meetings/web/html/031301_mtg.html

2004 SAP: https://archive.epa.gov/scipoly/sap/meetings/web/html/033004_mtg.html

2008 carbofuran SAP: https://archive.epa.gov/scipoly/sap/meetings/web/html/020508_mtg.html

The VVWM model used in PWC was also part of the 2004 SAP listed above.

The basis for T-REX was part of the Ecological Committee on FIFRA Risk Assessment Methods (ECOFRAM) report in 1999. The report can be found here: https://www.epa.gov/sites/production/files/2015-08/documents/terrreport.pdf

Let us know if you have additional 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: 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

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