To: Snyderman, Steven[Snyderman.Steven@epa.gov]
Cc: Friedman, Dana[Friedman.Dana@epa.gov]
From: Nguyen, Khue
Sent: Tue 4/18/2017 4:03:02 PM
Subject: RE: Diazinon Effects Determination

EFED still hasn't pulled together a response. I checked with them yesterday. There were a lot of emails this morning, but Chuck is heading up the response. Anita's suggestion for the path forward IS essentially the path forward. I think we'll prob send back a generic response.

So, nothing needed from you.

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: Snyderman, Steven
Sent: Tuesday, April 18, 2017 11:58 AM
To: Nguyen, Khue <Nguyen.Khue@epa.gov>
Cc: Friedman, Dana <Friedman.Dana@epa.gov>
Subject: RE: Diazinon Effects Determination

Sorry, just seeing this email now. I definitely received a lot of emails back and forth on this, I believe you were copied on all of them however. I'm not sure if a determination has been made yet however on a path forward. Is there anything you needed from Dana and I?

Steven Snyderman, Chemical Review Manager

Risk Management and Implementation Branch III

Pesticide Re-evaluation Division

Office of Pesticide Programs

Environmental Protection Agency

Snyderman.Steven@epa.gov

(703) 347-0249

From: Nguyen, Khue
Sent: Monday, April 17, 2017 2:20 PM
To: Friedman, Dana <Friedman.Dana@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>
Subject: RE: Diazinon Effects Determination

Did either of you get a response from efed on this email chain? Let me know.

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

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