To: Bolen, Brittany[bolen.brittany@epa.gov]
Cc: Lovell, Will (William)[lovell.william@epa.gov]; Yamada, Richard (Yujiro)[yamada.richard@epa.gov]
From: Beck, Nancy
Sent: Mon 2/5/2018 6:08:12 PM
Subject: RE: Question: 2016 EPA Request to NTP to Conduct Toxicological Study of PCB-11

I have not received a note on this. However IRIS had a public meeting on PCBs in 2015 and I recall some discussion of PCB 11 there.

Its possible the request for NTP studies came from the IRIS program, but I am just speculating. It may be useful to know the current status of the IRIS assessment. It may also be helpful to know which program office in EPA requested the PCB assessment

Looping in Richard as he may have the answers to these questions.

Nancy B. Beck, Ph.D., DABT

Deputy Assistant Administrator, OCSPP

P: 202-564-1273

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beck.nancy@epa.gov

From: Bolen, Brittany
Sent: Monday, February 5, 2018 1:02 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Cc: Lovell, Will (William) <lovell.william@epa.gov>
Subject: FW: Question: 2016 EPA Request to NTP to Conduct Toxicological Study of PCB-11

Nancy – have you received a similar note on this?

From: David Wawer [mailto:DavidWawer@CPMA.Com]
Sent: Friday, February 2, 2018 2:30 PM

To: Bolen, Brittany <bolen.brittany@epa.gov>
Cc: Jamie Conrad <jamie@conradcounsel.com>; Robert Helminiak <helminiakr@socma.com>; Tatiana Letcheva <TatianaLetcheva@CPMA.Com>
Subject: Question: 2016 EPA Request to NTP to Conduct Toxicological Study of PCB-11

Dear Brittany,

During the previous Administration (late 2015 or early 2016), a request originated from unknown career staff at EPA to the NTP for a study of PCB-11 (see below). The NTP webpage incorrectly characterized the known uses, however - color pigment manufacturers do not intentionally use PCB 11 to produce color pigments. My efforts to communicate with a responsible person at NTP, to correct their mischaracterization of known uses, went into a "black hole". We also had several conversations with EPA staff in the Program Assessment & Outreach Branch of OPPT in 2016 to better understand the genesis of the original request from EPA to NTP. As recently as last year, OPPT staff could not provide copies of any official or unofficial communication between EPA staff and NTP requesting the PCB-11 study. Such communication would have outlined the rationale for requesting the study in the first place.

It's now early 2018, with no information forthcoming from NTP staff, and still no understanding why this study was requested by EPA career staff in the first place.

I realize your office has been dealing with mega-issues, and quite successfully, during the first year of the Trump Administration, and that this "small NTP project" is probably not on your radar screen. We believe there are very pertinent questions surrounding this project for which stakeholders/taxpayers should be informed.

Why was this project initiated in the first place in light of the fact there was no public threat to human health & the environment?

How many taxpayer dollars have been spent to date?

How many NTP staff resources have been assigned to this project?

When is it going to end, what is going to be the final cost to taxpayers, and what does one expect to gain in terms of public policy as a result of this activity?

In your leadership role at EPA, we request that you communicate with OPPT officials and NTP officials, in an effort to provide greater public transparency on this three-year old agency activity?

CPMA representatives would be glad to meet with you to provide further background information and answer any related questions you may have.

Thank you for your consideration in this matter.

Dave

Testing Status of 3,3'-Dichlorobiphenyl 15035

- PCB 11

Yellow pigment

- Salmonella (G15035) On Test
  - Lot/Batch: 26692

David Wawer, Executive Director

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