Message

From: Janet Collins [jcollins@croplifeamerica.org]
Sent: 4/9/2018 3:39:23 PM
To: Keller, Kaitlin [keller.kaitlin@epa.gov]
CC: Beck, Nancy [Beck.Nancy@epa.gov]; csmith@gowanco.com; Courtney DeMarco [cdemarco@croplifeamerica.org]; Bolen, Derrick [bolen.derrick@epa.gov]
Subject: Re: Update Meeting Materials

Thank you Kaitlin. We can make that work.

On Apr 9, 2018, at 11:15 AM, Keller, Kaitlin <keller.kaitlin@epa.gov> wrote:

> Hi Janet,
>
> Apologies for any confusion. We can do an hour here Wednesday, can you come in 9-10am?
>
> Thank you,
> Kaitlin
>
> Kaitlin Keller, Special Assistant
> Office of Chemical Safety and Pollution Prevention
> U.S. Environmental Protection Agency
> (202) 564-7098
>
> **From:** Janet Collins [mailto:jcollins@croplifeamerica.org]
> **Sent:** Monday, April 09, 2018 8:13 AM
> **To:** Beck, Nancy <Beck.Nancy@epa.gov>
> **Cc:** csmith@gowanco.com; Courtney DeMarco <cdemarco@croplifeamerica.org>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>
> **Subject:** Re: Update Meeting Materials
>
> Thanks Nancy- my understanding is that we have one hour.
>
> Please confirm specifically
>
> On Apr 9, 2018, at 7:34 AM, Beck, Nancy <Beck.Nancy@epa.gov> wrote:
>
>> Thanks Janet.
>> Should I consider the below information the agenda for our meeting. My understanding is that your group is coming in for 30 minutes on Wednesday.
>>
>> Thanks,
>> Nancy
>>
>> _____
>> Nancy B. Beck, Ph.D., DABT
>> Deputy Assistant Administrator, OCSPP
>> P: 202-564-1273
>> M: 202-731-9910
>> beck.nancy@epa.gov

From: Janet Collins [mailto:jcollins@croplifeamerica.org]
Sent: Monday, April 9, 2018 7:08 AM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Cc: csmith@gowanco.com; Courtney DeMarco <cdemarco@croplifeamerica.org>
Subject: Update Meeting Materials
Importance: High

Nancy- again we really appreciate you joining our Strategic Oversight Council discussion on January 25th. You may recall that we had several items we committed to follow up on for you.

1. You raised the concept of a 3rd party review of the epidemiological data that is the basis for EPA's HED Memorandum that reapplies an FQPA 10x to all organophosphate risk assessments. We wanted to highlight for you that some 3rd party reviews of those data have been conducted. I have highlighted the summaries of the following papers and provided them in their entirety if you want to review them:
    a. Debbie Edwards Paper
    b. Rick Reiss/Michael Goodman Paper
    c. Gradient Paper (2015)
2. We pointed out that EPA had completed risk assessments for some organophosphates after the epidemiological data were available to them where no FQPA 10x was applied. Here are the specific examples. Here are the specific examples of organophosphates which EPA removed the FQPA 10x and did not reapply until the HED memo issued in 2015:
    a. Bensulide – EPA scoping document in 2008 did not reapply the FQPA 10x based on the epi data despite the Agency being aware of those data
    b. Phosmet – EPA scoping document in 2009 did not reapply the FQPA 10x based on the epi data despite the Agency being aware of those data

    Additionally, I also include a letter written in 2013 by Steve Bradbury (then Director of the Office of Pesticide Programs) regarding the use of these same epidemiology data in risk assessments. It is our contention that for EPA to reapply the FQPA 10x to a compound from which the Agency had removed it, they must have reliable and available data. The researchers have not provided the data to the Agency for the epidemiological studies that are the basis for EPA reapplying the FQPA 10x.

3. Ongoing mechanistic data. You mentioned ongoing research–possibly at ORD – to determine if there is some other mode of action occurring at doses lower than those that inhibit cholinesterase that may cause neurodevelopmental effects. Can you please provide more information about what is being done? We would just like to point that previous discussions on this topic often focused on brain rather than RBC and the focus really needs to be on RBC.

Thanks again for agreeing to meet with us on Wednesday- we appreciate it.

Janet
+1-202-833-4474 (direct)
+1-703-868-3280 (mobile)