Message

From: Henry, Tala [Henry.Tala@epa.gov]
Sent: 11/16/2018 12:42:30 AM
To: Beck, Nancy [Beck.Nancy@epa.gov]
CC: Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]; Morris, Jeff [Morris.Jeff@epa.gov]; Scheifele, Hans [Scheifele.Hans@epa.gov]
Subject: RE: Administrator TSCA-related comment for PFAS management plan
Attachments: http___www.oecd.org_officialdocuments_publicdisplaydocumentpdf__cote=ENV-JM-MONO(2018)7&doclanguage=en.pdf

In which set?

The TSCA Inv and Active are actual chemicals manufactured of course.

The 4730 number comes a 2018 OECD document (attached) that updates a 2007 list – it is a list of lists (from a bunch of countries inventories);

> The chemicals on the OECD list ALL have CASRNs…however, the OECD database includes all PFAS that may have been present on the global market, not just those that actually were present on the marketplace. Further, OECD notes: "PFASs that are on the global market and in the environment consist of intentionally produced substances and unintentionally generated substances (i.e. unreacted residuals, by-products, and degradation intermediates). The original intention of this study was to focus on identifying PFASs that have been produced for commercial uses (as registered under many national/regional chemical inventories). However, during the development of the list, it was noted that some sources do not have such a clear indication (for details, see Table 2 below). Therefore, a clear labelling of PFASs with respect to their origins (e.g., produced for commercial uses, produced for research purposes, unintentionally generated) cannot be made in this study;…"

From: Beck, Nancy
Sent: Thursday, November 15, 2018 6:25 PM
To: Henry, Tala <Henry.Tala@epa.gov>
Cc: Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Baptist, Erik <Baptist.Erik@epa.gov>; Morris, Jeff <Morris.Jeff@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>
Subject: Re: Administrator TSCA-related comment for PFAS management plan

Is it possible many of the identified products are not actually manufactured but are metabolites or breakdown products? If true, is there a way to characterize that?

****

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention
P: 202-564-1273
beck.nancy@epa.gov

On Nov 15, 2018, at 5:43 PM, Henry, Tala <Henry.Tala@epa.gov> wrote:

> It is true that OW was assuming mutual exclusivity, which we know is not true…they realized it when I pinged them to ask where they got their #s.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

<image001.png>

From: Beck, Nancy
Sent: Thursday, November 15, 2018 5:32 PM
To: Henry, Tala <Henry.Tala@epa.gov>
Cc: Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Baptist, Erik <Baptist.Erik@epa.gov>; Morris, Jeff <Morris.Jeff@epa.gov>
Subject: Re: Administrator TSCA-related comment for PFAS management plan

It's on my list. What is the response to Jeff's very good question?

****

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
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P: 202-564-1273
beck.nancy@epa.gov

On Nov 15, 2018, at 5:26 PM, Henry, Tala <Henry.Tala@epa.gov> wrote:

> I sent you all our proposed edits to the chart in email at yesterday @ 1:03 pm ...OW awaits our input.
>
> **From:** Holsinger, Hannah
> **Sent:** Thursday, November 15, 2018 4:36 PM
> **To:** Albert, Ryan <Albert.Ryan@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>
> **Cc:** Wadlington, Christina <Wadlington.Christina@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>; Lan, Alexis <lan.alexis@epa.gov>
> **Subject:** RE: Administrator TSCA-related comment for PFAS management plan
>
> Hi Tala,
> Following up on Ryan's email to see the status of your edits. We are incorporating the remaining edits this afternoon.
>
> Thanks!
> Hannah
>
> **From:** Albert, Ryan
> **Sent:** Wednesday, November 14, 2018 3:25 PM
> **To:** Henry, Tala <Henry.Tala@epa.gov>
> **Cc:** Wadlington, Christina <Wadlington.Christina@epa.gov>; Holsinger, Hannah <Holsinger.Hannah@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>; Lan, Alexis <lan.alexis@epa.gov>
> **Subject:** RE: Administrator TSCA-related comment for PFAS management plan

Hi Tala,

Thank you for your review, intending to provide edits, and your question. In regards to the question:

- The numbers were derived from OPPT's internal summary report (dated September 5th, 2018) and OECD's global database on PFAS. Both reports are attached.
- The graphic was based on a statement in an earlier draft of the management plan, where we wrote "According to the Organization for Economic Cooperation and Development (OECD 2018), **over 4,730** PFAS-related compounds have been identified in the public domain and the number is continuing to grow as industry develops new chemicals. In the United States alone, the EPA's TSCA Chemicals Substances Inventory—which lists existing chemical substances that are manufactured or processed in the United States—includes **1,220 PFAS**, of which **551** are known to have been commercially active in the last decade."
- In the most recent draft of the management plan, this statement has since been changed to read "Over **4,000 PFAS** may have been used worldwide (OECD 2018). The EPA's Toxic Substances Control Act (TSCA) Chemical Substance Inventory estimates that over **1,220 PFAS** have been listed on the TSCA Inventory, of which **551** are known to be commercially active within the last decade."
- Upon reexamining the numbers in the figure in light of your question, we noted we assumed numbers in the figure represented a binary situation; i.e., the numbers inside the United States and outside the United States were presented as though they are mutually exclusive. However, we recognize this may be a mischaracterization as some compounds may be produced both inside and outside the U.S. Hence, we may need to remove the 3,560 number or recharacterize how that number is presented.
- **We welcome OPPT's feedback on how these figures should be characterized and summarized in the graphic.**

Please let us know if you have any additional questions or need any additional information.

Best regards,
Ryan

Ryan Albert, Ph.D.
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Standards and Risk Management Division
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(202) 564-0763

From: Henry, Tala
Sent: Wednesday, November 14, 2018 2:35 PM
To: Albert, Ryan <Albert.Ryan@epa.gov>
Cc: Wadlington, Christina <Wadlington.Christina@epa.gov>; Holsinger, Hannah <Holsinger.Hannah@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>; Lan, Alexis <lan.alexis@epa.gov>

Subject: RE: Administrator TSCA-related comment for PFAS management plan
Importance: High

Hi,
We are reviewing this now and have some edits; however, can you please advise as to the source of the numbers in the pie chart??

Tala R. Henry, Ph.D.
Acting Deputy Director
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency

T: 202-564-2959
E: henry.tala@epa.gov

From: Albert, Ryan
Sent: Tuesday, November 13, 2018 8:34 PM
To: Henry, Tala <Henry.Tala@epa.gov>
Cc: Wadlington, Christina <Wadlington.Christina@epa.gov>; Holsinger, Hannah <Holsinger.Hannah@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>; Lan, Alexis <lan.alexis@epa.gov>
Subject: Administrator TSCA-related comment for PFAS management plan

Hi Tala,

We received the Acting Administrator's comments on the PFAS management plan today. There was one to-do that was related to the TSCA program. I Deliberative Process / Ex. 5

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After consulting with our team, including Christina Wadlington, we believe the draft graphic Christina sent you early this morning likely meets the Acting Administrator's objectives. I am forwarding her note here and the graphic for your consideration.

We welcome your feedback on the graphic and input as to whether, in your opinion, we are missing key detailed information in this section you would recommend briefly adding that furthers the AA Wheeler's objectives.

Please note I am also cc'ing Hannah Holsinger here to ensure she stays in the loop (she is on international travel through Thursday and deserves an evening or two to herself). We would be most grateful for any comments on the attached, or fleshed-out alternate recommended approach, by COB tomorrow (Wednesday 11/14) if possible.

Please let us know if you have any questions or if you need any additional information.

Best regards,
Ryan

Ryan Albert, Ph.D.
Acting Chief, Standards and Risk Reduction Branch
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From: Wadlington, Christina
Sent: Tuesday, November 13, 2018 7:51 AM
To: Henry, Tala <Henry.Tala@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>
Cc: Scheifele, Hans <Scheifele.Hans@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
Subject: Graphic for the PFAS Management Plan

Morning!

We are putting together a few graphics for the PFAS management plan. Can you please take a look at the below and provide edits/thoughts?
PS I understand that the numbers update, if it's helpful we can add a "as of" date to the bottom to ensure it reflects the accurate numbers.
<image001.png>
Thank you.