Message

**From**: Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]
**Sent**: 3/9/2018 8:49:28 PM
**To**: Strauss, Linda [Strauss.Linda@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]; Wise, Louise [Wise.Louise@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]
**Subject**: RE: LINDA/OPP: Project on Gov't Oversight - Thursday DDL - Request for info on WPS/CPA

**Ex. 5 Deliberative Process (DP)**

**From:** Strauss, Linda
**Sent:** Friday, March 09, 2018 9:16 AM
**To:** Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
**Subject:** FW: LINDA/OPP: Project on Gov't Oversight - Thursday DDL - Request for info on WPS/CPA

**Ex. 5 Deliberative Process (DP)**

**From:** Strauss, Linda
**Sent:** Friday, March 09, 2018 8:46 AM
**To:** Beck, Nancy <beck.nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
**Subject:** FW: LINDA/OPP: Project on Gov't Oversight - Thursday DDL - Request for info on WPS/CPA

**Ex. 5 Deliberative Process (DP)**

**From:** Bertrand, Charlotte
**Sent:** Thursday, March 08, 2018 7:03 PM
**To:** Strauss, Linda <Strauss.Linda@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>
**Subject:** RE: LINDA/OPP: Project on Gov't Oversight - Thursday DDL - Request for info on WPS/CPA

**Ex. 5 Deliberative Process (DP)**

**From:** Strauss, Linda
**Sent:** Thursday, March 08, 2018 1:54 PM
**To:** Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>
**Subject:** RE: LINDA/OPP: Project on Gov't Oversight - Thursday DDL - Request for info on WPS/CPA

Let me know if you have changes to this. Thanks, Linda

1) The December notice published in the Federal Register by the agency says that "by the end of FY 2018, EPA expects to publish a Notice of Proposed Rulemaking to solicit public input on proposed revisions to the WPS requirements for minimum ages, designated representatives, and application exclusion zones." However, the WPS home page says the three requirements that went into effect in January 2018 regarded pesticide safety training, new posters and suspension of application if people are in the "application exclusion zone."

What is the difference between the AEZ provision in effect now and the one that will be considered in the new proposed rulemaking?

**Ex. 5 Deliberative Process (DP)**

2) The EPA web page on the CPA states that:

"EPA has been engaging stakeholders both formally and informally on ideas for the revisions since the 1990s. EPA has received extensive feedback, including in-depth comments on the proposed revisions. The revisions were developed with input from individuals, state and tribal regulatory partners and other organizations through numerous stakeholder meetings and other outreach."

Given this substantial investment in the rule revisions, can you tell me who or what parties influenced Administrator Pruitt's decision to revisit elements of the changes?

**Ex. 5 Deliberative Process (DP)**

3) Farmworker advocates point to EPA's own findings of up to 3,000 preventable incidents of pesticide exposure per year as evidence of the harm to workers these delays will pose. Does EPA dispute these findings, or does it believe the delays will not result in unnecessary exposure incidents?

# Ex. 5 Deliberative Process (DP)

**From:** Daguillard, Robert
**Sent:** Wednesday, March 07, 2018 3:14 PM
**To:** Han, Kaythi <Han.Kaythi@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Sisco, Debby <Sisco.Debby@epa.gov>
**Subject:** LINDA/OPP: Project on Gov't Oversight - Awaiting DDL Info - Request for info on WPS/CPA

| | |
|---|---|
| OUTLET | POGO |
| REPORTER | LAURA PETERSON |
| DDL | Awaiting Info |

Linda and team, what's a reasonable ETA? No info yet from the reporter.

Cheers, R.

++

Hi Robert, I'm closing in on my deadline so wanted to retry getting a quote from you. Again, I'm writing a piece on the EPA's delay of certain Worker Protection Standards and Certification of Pesticide Applicators revisions.

Here are my specific questions:

2) The December notice published in the Federal Register by the agency says that "by the end of FY 2018, EPA expects to publish a Notice of Proposed Rulemaking to solicit public input on proposed revisions to the WPS requirements for minimum ages, designated representatives, and application exclusion zones." However, the WPS home page says the three requirements that went into effect in January 2018 regarded pesticide safety training, new posters and suspension of application if people are in the "application exclusion zone."

What is the difference between the AEZ provision in effect now and the one that will be considered in the new proposed rulemaking?

2) The EPA web page on the CPA states that:

"EPA has been engaging stakeholders both formally and informally on ideas for the revisions since the 1990s. EPA has received extensive feedback, including in-depth comments on the proposed revisions. The revisions were developed with input from individuals, state and tribal regulatory partners and other organizations through numerous stakeholder meetings and other outreach."

Given this substantial investment in the rule revisions, can you tell me who or what parties influenced Administrator Pruitt's decision to revisit elements of the changes?

3) Farmworker advocates point to EPA's own findings of up to 3,000 preventable incidents of pesticide exposure per year as evidence of the harm to workers these delays will pose. Does EPA dispute these findings, or does it believe the delays will not result in unnecessary exposure incidents?

Thanks for your prompt response. I'm working on a deadline of COB tomorrow (Thursday), but would like to get your comments sooner if possible.

Cheers, R.

Robert Daguillard
Office of Media Relations
U.S. Environmental Protection Agency
Washington, DC
+1 (202) 564-6618 (O)
+1 (202) 360-0476 (M)

---

**From:** Han, Kaythi
**Sent:** Thursday, February 15, 2018 12:15 PM
**To:** Daguillard, Robert <Daguillard.Robert@epa.gov>
**Subject:** RE: Request for info on WPS/CPA

Hi Robert, did you mean to send this to me?

---

**From:** Daguillard, Robert
**Sent:** Thursday, February 15, 2018 11:32 AM
**To:** Han, Kaythi <Han.Kaythi@epa.gov>
**Subject:** RE: Request for info on WPS/CPA

**Good morning Laura,**

**My colleagues from the pesticides office have forwarded me your inquiry. Do you have specific questions you could send? Also, are you on deadline?**

**Happy to discuss.**

**Thanks, R.**

**From:** Laura Peterson [mailto:lpeterson@pogo.org]
**Sent:** Wednesday, February 14, 2018 5:22 PM
**To:** Keaney, Kevin <Keaney.Kevin@epa.gov>
**Subject:** Request for info on WPS/CPA

Hi Kevin,

I'm contacting you at the recommendation of Bill Jordan, who has helped me with an article I'm writing on the proposed WPS/CPA rule updates. I'd like to fact-check some points with you and talk a bit about state implementation issues. Our conversation would be on background, but if you'd like to add a quote you of course can.

I'd like to speak with you tomorrow if you have time, though Friday morning could also work. Just let me know what's best for you.

Thanks for your time,

Laura

--

**Laura Peterson**
Project On Government Oversight | pogo.org
1100 G Street NW, Washington DC 20005
202.347.1122
GPG Fingerprint: C93D E5E3 7A6E 809B CF5A 7B55 6CDA 1049 7DFE F540
Signal: 1.202.656.9263

@LPetersonDC

Web | Blog | | | YouTube | CFC #10785