Pat Rizzuto Interview Questions

Questions for BOTH OPPT and OPP

1. What do you bring from your work at NACWA, ECOS, Region 1, and the Chemistry Council that you see yourself using as assistant administrator for chemical safety and pollution prevention?

2. The chemicals office has a lot on its plate with Lautenberg deadlines this year even before the House went Democratic. Now you've still got the full plate and questions to answer and hearings to prep for from the Hill. **What's on your front burner?**

   Our 1st ten risk evaluation are a priority. We're starting an important stage in our evaluations of existing chemicals in 2019 as we complete them and prioritize the next 40 chemicals (20 high and 20 low) for risk evaluation.

   In addition to these activities, we're hard at work on a number of other things, including:
   - the Chemical Data Reporting rule;
   - the TSCA Inventory CBI review plan;
   - a proposed rule addressing certain PBTs;
   - a final rule on the Dust Lead Hazard Standard; and implementing continued improvements to the new chemicals review process.
   - AND New Chemical Reviews, moving the ones under review to completion! We are waiting for additional information for much of them.

More on NEW CHEMICALS:

- The 2016 amendments required EPA to make an affirmative finding on new chemicals (or significant new uses of existing chemicals) before those chemicals can enter the market or manufacturing/processing for new uses can commence.
- These new review requirements became effective immediately, and OCSPP has been working tirelessly since then to apply the standards to all reviews ongoing at that time and to keep pace with a continuous stream of new submissions.
- EPA typically receives around 1,000 new chemical submissions per year and has approximately 300-350 case under review at any given time.
- Given the significant changes in TSCA and review process, EPA has a larger than average number of cases in process.
- However, we are firmly committed to reducing this number and ensuring that EPA continues to meet its review obligations under TSCA.
- We are confident that we are reviewing new chemical submissions in a manner consistent with the statutory framework, while striving to increase transparency of our decisions and rationale.
- Completing these reviews in a timely manner remains another top priority for the leadership in OCSPP and the Agency. We are continuing to improve processes to meet new requirements in law.

3. The peer reviews for the first 10 risk evaluations may not take place until late spring or during the summer, according to what agency staff said at GlobalChem. Yet EPA has said it will complete all 10 risk evaluations by December. Does that risk the EPA being accused of ignoring both public comments and peer review recommendations in a rush to meet the statutory deadline?

   EPA is required to both seek public comment and peer review the risk evaluations. EPA took public comment on these BEFORE bringing them for peer review.

   Ignoring the outcoming of these would violate the risk evaluation regulation promulgated under TSCA.

4. Similarly, the agency has only 9 months to prioritize 40 chemicals, and 6 months of that will be for public comments. Does the EPA risk being accused of ignoring public comments?

   EPA is required to hold two public comment periods during the prioritization process. EPA sees both as integral to the prioritization process as we hope the public will provide additional information to inform the process.

OPPT HR Questions SENT TO PAT 5/2 (She wanted them ahead of time. She may not ask you about them. We only gave her <u>publicly available information</u>. We are not giving her contract $ info nor exact # of people we are trying to hire).

1. How many full time equivalent employees did OPPT have in June 2016 (or close to that month) before the Lautenberg Chemical Safety Act became law?

   OPPT's FY 2016 FTE ceiling was 282.1.

2. How many do you have as of now (or most recent available figure)?

   The FY 2019 FTE ceiling is 340.1. Note the FY 19 FTE ceiling is not directly comparable to the FY 2016 ceiling as the TRI program was reorganized from OEI to OPPT in FY 2017 with a shift of 24.6 FTE.

3. Can you break those OPPT staff down into rough areas of expertise e.g. chemists, risk assessors, economists, industrial hygienists?

   Roughly half of OPPT consists of staff classified as generalists. These staff undertake a wide variety of tasks including administrative functions, internal project management and coordination, contracts management, regulatory development, and development, reviews and coordination of internal and external documents and work products.

The other half of OPPT staff are specialists. Approximately one third of these specialists are engineers, economists, IT specialists and a small number of attorneys. The remainder are in scientific fields of expertise, and are primarily engaged in developing and reviewing exposure modeling, and undertaking and managing risk assessment work.

4. Alex Dunn said OPPT was hiring. How many more people do you plan/hope to hire? What expertise are you seeking?
   OPPT is undertaking a concerted and focused hiring effort to hire up to the FY 2019 FTE ceiling of 340.1. OPPT's senior leadership team completed several analyses and workforce planning exercises to identify and prioritize the most critical hiring needs to fill remaining slots. The majority of the critical hires are for scientific positions.

5. How many contractor firms are working with OPPT? What are their broad areas of support?

   OPPT is obtaining programmatic support from a variety of contractors. Broad areas of support include chemical risk assessment for new and existing chemicals; economic and other analysis for chemical risk management; chemical testing and analysis; information technology (IT) and other support for information collection and management; general IT; outreach and communication support; and confidential business information management.

OPP Questions:

1. **Do you think the current allowed uses of chlorpyrifos and other organophosphates are protective enough of human health?**

To be protective of public health and the environment (and to follow the law), it is critical that pesticide users following the label.

As part of the pesticide registration and registration review process, we work closely with our partners at USDA and FDA to ensure the safety of the U.S. food supply. One of the most critical steps that consumers can do is to follow a diverse diet.

Regarding chlorpyrifos specifically, since its reregistration in 2006, we have reviewed hundreds of studies from laboratory animals, cell systems (including human), biomonitoring, and epidemiology on a variety of scientific areas related to human health effects. These studies are being evaluated together in a weight-of-evidence analysis. Therefore, there is significant new information relevant to the human health effects of organophosphate pesticides.

EPA is currently evaluating the organophosphates and will take comments on our assessments before consideration of any risk management.

We will also engage with the registrants and the public health community to ensure we are considering all relevant data in our assessments. If states, localities, other federal agencies, and user groups have relevant information that could aid in the analysis, we will use this information as well. As new scientific information becomes available that changes our understanding of potential risks as well as pesticide efficacy, we can revisit our decisions.

2. EPA has less than 90 days to come up with a rule on chlorpyrifos. Does EPA's 2015 decision to revoke tolerances of the pesticides on food crops impact the agency's recommendation going forward? If not, why?

Commented [SL1]: New Q submitted earlier in the week

3. **Do you agree that the EPA should reassess the registration of chlorpyrifos in 2022 rather than imposing immediate restrictions?**

EPA has prioritized the re-evaluation of chlorpyrifos, ensuring that the best available science is considered in our decision-making.

4. **EPA announced new restrictions on dicamba herbicides last October, but state regulators continue to receive a high number of drift complaints this summer. Short of a full ban, are these steps EPA could take to protect farmers from drift?**

Last October, EPA updated the label to require stronger measures to ensure that the pesticide is used in a manner that reduces spray drift or volatility. A critical aspect of the 2018 decision is that EPA required the registrants to conduct extensive field testing under good laboratory practices across multiple geographies to confirm the effectiveness of the new label requirements. Those studies will begin during the 2019 growing season.

The results of the new data will greatly inform future EPA decisions regarding dicamba. In particular, these data will help the Agency understand if it should let the registrations expire or whether additional changes in the registration are needed to address problems with resistant weeds or pesticide drift.