Message

From: Pagan, Ines [Pagan.Ines@epa.gov]
Sent: 10/16/2015 12:37:10 PM
To: Rimer, Kelly [Rimer.Kelly@epa.gov]
Subject: RE: Follow up on chloroprene modeling and additional questions

I forwarded the email to Norm and asked him to meet soon with us and others from IRIS that need to be informed so we

Ex. 5 Deliberative Process (DP)

Ines Pagan
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From: Rimer, Kelly
Sent: Friday, October 16, 2015 6:10 AM
To: Pagan, Ines
Subject: Fwd: Follow up on chloroprene modeling and additional questions

Ines,

Here is an email from Patrick Walsh. **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

Thanks

Kelly Rimer
Leader, Air Toxics Assessment Group
US EPA
Office of Air Quality Planning and Standards
109 TW Alexander Drive
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Begin forwarded message:

> **From:** <PATRICK.A.WALSH@dupont.com>
> **Date:** October 15, 2015 at 6:27:32 PM EDT
> **To:** <Kelly.Petersen@LA.GOV>, <Doris.B.Grego@dupont.com>, <James.B.Allen@dupont.com>, <Carlos.F.Saldana@dupont.com>, <Palma.Ted@epa.gov>, <Morris.Mark@epa.gov>, <Casso.Ruben@epa.gov>, <Rimer.Kelly@epa.gov>, <Strum.Madeleine@epa.gov>
> **Subject: RE: Follow up on chloroprene modeling and additional questions**

All,

I have reviewed all the appropriate information and my position hasn't changed. I'm worried that EPA is going down the wrong path. Let me explain my thinking to you:

My problem is that the data as presented by EPA with regard to NATA are presented as "cancer risk":

Facility ID	FIPS	Tribal Code	Parameter	Pollutant	Risk Value (cancer risk reported in a million)	Facility Emissions (tpy)	Facility Name	State	County Name	Comment
8026611	22095		Cancer risk	Chloroprene	1816.044	130.0775	E I DuPont de Nemours & Co - Pontchartrain Site	LA	St. John the Baptist	

(Taken from email from Madeleine Strum to Kelly Petersen, 6/24/15)

That would read to most people that chloroprene is a known, proven human carcinogen. But it hasn't been proven, or even generally accepted, and EPA's own toxicology data states such.

The IRIS database for chloroprene reads similarly to the IARC monograph:

"Under the Guidelines for Carcinogen Risk Assessment (U.S. EPA, 2005), there is evidence that chloroprene is 'likely to be carcinogenic to humans'"

Even the IRIS group will not explicitly state that chloroprene is a KNOWN human carcinogen. The entire series of documents discusses chloroprene's carcinogenicity in mice and rats **only**. While they can be used as models for human physiology, mice and rats are NOT human, and there are numerous examples of materials that are spectacularly toxic to non-human animals but have little or no effect on humans (chocolate springs to mind). Therefore, it is, in my opinion, an irresponsibly large leap to present the chloroprene release data as definitely carcinogenic to humans by presenting it as "increased cancer risk".

In addition, the epidemiological data does not comport with the model at all. The following table describes actual cancer rates for St. John Parish for the most recent 4-year period for which data is available:

Rank	County	Annual Incidence Rate(†) over rate period -	Lower 95% Confidence Interval	Upper 95% Confidence Interval	Average Annual Count over rate period	Rate Period	Recent Trend	Recent 5-Year Trend (‡) in Incidence Rates	Lower 95% Confidence Interval	Upper 95% Confidence Interval

		cases per 100,000								
53	St. John the Baptist Parish(7,9)	460.8	432.3	490.7	209	2008-2012	stable	-2.2	-9.4	5.6

(Data from http://statecancerprofiles.cancer.gov/incidencerates/index.php?stateFIPS=22&cancer=001&race=00&sex=0&age=001&type=incd&sortVariableName=rate&sortOrder=default#results)

Given the following:

1. 50+ year history making chloroprene in St. John Parish
2. 20-30 year latency period for most cancers

According to the risk factors EPA attributes to our chloroprene emissions, St. John Parish should have the highest cancer rate in the state. This should be especially true given that our history of emitting chloroprene is much longer than the typical latency for cancer. But in actuality, St. John is in the **lowest quartile** of measured cancer rates in the state (#53 out of 66 parishes) and the rate of cancer is decreasing according to the 5-year trend. Thus, the model has a serious flaw as it doesn't come close to reflecting real, published cancer rate data.

The above, taken together, indicate that EPA is planning to publish misleading data in an inflammatory way. Therefore, it would be irresponsible to publish it. I strongly urge EPA to reconsider its present course.

Patrick A. Walsh, CIH
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-----Original Appointment-----
From: Kelly Petersen [mailto:Kelly.Petersen@LA.GOV]
Sent: Tuesday, October 06, 2015 10:09 AM
To: Kelly Petersen; GREGO, DORIS B; ALLEN, JAMES B; SALDANA, CARLOS F; Palma, Ted; Morris, Mark; Casso, Ruben; 'Rimer, Kelly'; Strum, Madeleine; WALSH, PATRICK A.
Subject: Follow up on chloroprene modeling and additional questions

When: Tuesday, October 06, 2015 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).
Where: `DEQ/Room 919 - OMF Conference

Please join a conference call at 11am central time on Tuesday, October 6th. The call in information is below.

Meeting Number: (b) (6) [redacted]

To join the conference call:
(1) Dial 888-363-4735, or 215-446-3657 for international calls.
(2) Enter the Meeting Number, then #

Thanks, Kelly Petersen

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