Message

**From**: Clark, Jacqueline [clark.jacqueline@epa.gov]
**Sent**: 7/23/2020 1:48:45 PM
**To**: Lazos, Pamela [Lazos.Pamela@epa.gov]; Wilson, Jennifer [wilson.jenniferA@epa.gov]; Reinhart, Roger [Reinhart.Roger@epa.gov]; Rowsey, Kevin [rowsey.kevin@epa.gov]
**Subject**: RE: DuPont QAPP and CBI

Sorry – didn't see Pam's email before sending my response to Jenny. Let's do as Pam suggests.

Sincerely,

***Jacqueline Clark***

Jacqueline Clark
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**From:** Lazos, Pamela <Lazos.Pamela@epa.gov>
**Sent:** Thursday, July 23, 2020 7:44 AM
**To:** Wilson, Jennifer <wilson.jenniferA@epa.gov>; Clark, Jacqueline <clark.jacqueline@epa.gov>; Reinhart, Roger <Reinhart.Roger@epa.gov>; Rowsey, Kevin <rowsey.kevin@epa.gov>
**Subject:** RE: DuPont QAPP and CBI

Should we have a quick call about the encryption, Jenny? Just want to make sure we are in compliance with the regs.

I will see if I can find a template. I did one about 6 or 7 years ago so there may be something more up-to-date.

Thanks,
Pam

**From:** Wilson, Jennifer <wilson.jenniferA@epa.gov>
**Sent:** Tuesday, July 21, 2020 8:36 PM
**To:** Lazos, Pamela <Lazos.Pamela@epa.gov>; Clark, Jacqueline <clark.jacqueline@epa.gov>; Reinhart, Roger <Reinhart.Roger@epa.gov>; Rowsey, Kevin <rowsey.kevin@epa.gov>
**Subject:** RE: DuPont QAPP and CBI

Hi Pam,

I looked and I can't find the old CBI letter. It was probably from nine or so years ago and the templates may have changed anyway. Does Region 3 have a template I can use? If not, I will check with Nicole Wood in Region 5.

Also, are you and Jacquie okay with me encrypting an e-mail and e-mailing the file to them in the mean time so they can start their work? I will tell them not to release anything outside the Agency, but I think they need to start looking into the data. I would like to do that because this back and forth CBI process with DuPont will take a little while and we need

to keep the research project moving. I have requested that all of them take CBI training and I am doing my best to make sure they have done that before I send the file.

Thank you,
Jenny

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**From:** Lazos, Pamela <Lazos.Pamela@epa.gov>
**Sent:** Tuesday, July 21, 2020 2:42 PM
**To:** Wilson, Jennifer <wilson.jenniferA@epa.gov>; Clark, Jacqueline <clark.jacqueline@epa.gov>; Reinhart, Roger <Reinhart.Roger@epa.gov>; Rowsey, Kevin <rowsey.kevin@epa.gov>
**Subject:** RE: DuPont QAPP and CBI

That sounds like a good approach, Jenny. There's no way all 256 pages of that report are CBI. Do you have the old letter? Under the CBI regs, they have to identify what the CBI is and if they don't then I believe after a certain time they lose the right. HQ has to approve the CBI so there's a whole process they have to go through to get the CBI determination.
Thanks,
pl

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**From:** Wilson, Jennifer <wilson.jenniferA@epa.gov>
**Sent:** Tuesday, July 21, 2020 2:17 PM
**To:** Clark, Jacqueline <clark.jacqueline@epa.gov>; Lazos, Pamela <Lazos.Pamela@epa.gov>; Reinhart, Roger <Reinhart.Roger@epa.gov>; Rowsey, Kevin <rowsey.kevin@epa.gov>
**Subject:** DuPont QAPP and CBI

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Hi Jacquie and Pam,

For our RARE Grant PFAS research project with ORD, ORD would like to see and use parts of the QAPP for the DuPont Washington Works sampling. However, the QAPP is marked as CBI and is 256 pages long. I think we should ask the company what it considers CBI, so ORD knows not to include that information in its research papers. In the past, I wrote a letter to a company to have the company substantiate a CBI claim. Basically, the company needed to say what in a document was CBI, so it wasn't released in a FOIA. I propose writing a similar letter here, if you two are okay with that approach? Please let me know.

I believe we have standard template letters for this? Jacquie, I think Nicole Wood is the CBI attorney. I would just obtain the newest template from her, right? Then, I could draft the letter, and have you and Pam review it?

Thank you,
Jenny

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