Message

From: Pamela Miller [pamela@akaction.org]
Sent: 2/28/2021 6:44:28 AM
To: Kovner, Karissa [Kovner.Karissa@epa.gov]
Subject: RE: Question re DP
Attachments: EPA-Oxychem Dechlorane Plus 2004-2009.pdf

Hi Karissa,
I found this in ChemView/CDR. It looks as though the most recent information from Oxychem to EPA was in 2008. Is there anything more recent? It does look as though EPA reviewers found deficiencies in the data reported. Any additional information would be helpful.
Thanks,
Pam

Pamela Miller, she/her/hers
IPEN Co-Chair (www.ipen.org) and
Executive Director
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From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Thursday, February 18, 2021 7:37 PM
To: Pamela Miller <pamela@akaction.org>
Subject: Re: Question re DP

Hi,

Sorry, I did check and it is CBI. I can't even find out for myself.

I also don't have any toxicological info on DP from industry. Did we mistakenly suggest we did? Our EPA internal toxicologists reviewed the POPRC papers and gave us their assessment based on the Convention. I don't even know who the "industry" is in the United States.

To answer your other questions, DP was on the original TSCA Inventory, so I don't think any formal assessment of DP has been done under TSCA.

Hope this helps.

Best,

Karissa
EPA mobile: (202)365-7838

On Feb 18, 2021, at 6:51 PM, Pamela Miller <pamela@akaction.org> wrote:

Hello Karissa,
I hope that you are well.
I am wondering whether you were able to find out any information on DP production in the U.S.? Also, I am curious about any toxicological data that EPA may have received from industry on DP. It seems that there should be more information that EPA could have provided on adverse effects of DP, given that it has been in production for decades now in the U.S. Has EPA requested information on adverse effects and if so, how can these data/studies be made available for public review?
Thank you for any information that you can provide or if there is someone else there that I should talk with about this.
Best regards,
Pam

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From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Saturday, January 9, 2021 7:39 PM
To: Pamela Miller <pamela@akaction.org>
Subject: Re: Question re DP

There are lots of CBI categories, but the most common one is that if there are a small number of producers (I believe the rule is five or fewer), thereby allowing competitors to figure out production numbers by virtue of knowing their own and having a sense of the others, it's CBI. I believe it's all CBI even if only 1 of the 5 or under asks for it, maybe even automatically if it's fewer than five. I forget the exact way it works.

Best,
Karissa
EPA mobile: (202)365-7838

On Jan 9, 2021, at 11:01 PM, Pamela Miller <pamela@akaction.org> wrote:

OK thanks. Although I am curious as to why production volumes are CBI? I was reviewing the Risk Profile and they included this ECHA reference: "Production at the Oxychem facility ceased in mid-2016 (ECHA, 2020a)." Oxychem superceded the infamous Hooker Chemical of Love Canal fame. You are working at a late hour!
Thanks again,
Pam

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From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Saturday, January 09, 2021 6:52 PM
To: Pamela Miller <pamela@akaction.org>
Subject: Re: Question re DP

It's on the TSCA Inventory and subject to the Chemical Data Reporting Rule, which requires manufacturers and importers to provide U.S. EPA with production, import and use volumes, as well as other relevant information. Production was reported in the last two CDR submission periods (covering calendar years 2011-2015), but were claimed as CBI. So I can't disclose any production volumes — and I don't have access to the files anyway. What I don't know is what I can confirm about whether companies may or may not be reporting. I honestly don't know anything about the company you're referencing nor the rules, so I'll have to ask next week?

Best,
Karissa
EPA mobile: (202)365-7838

On Jan 9, 2021, at 10:23 PM, Pamela Miller <pamela@akaction.org> wrote:

Hello Karissa,
Are you able to confirm that production of DP at the Oxychem facility ceased in mid-2016?
Thanks,
Pam

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