Message

From: Snyderman, Steven [Snyderman.Steven@epa.gov]
Sent: 1/2/2020 8:29:17 PM
To: Perlis, Robert [Perlis.Robert@epa.gov]; Huskey, Angela [Huskey.Angela@epa.gov]; Knorr, Michele [knorr.michele@epa.gov]; Koch, Erin [Koch.Erin@epa.gov]
CC: Mannix, Marianne [Mannix.Marianne@epa.gov]; Friedman, Dana [Friedman.Dana@epa.gov]; Khan, Matthew [khan.matthew@epa.gov]; Ross, Philip [Ross.Philip@epa.gov]
Subject: RE: neonics OGC attorney
Attachments: Draft Imidacloprid PID 12.2.20 for OGC and DDs.docx

Good afternoon,

I realize many people have been on vacation, but I just wanted to flag the imidacloprid PID again and see if the greater OGC team has had an opportunity to take a look at this. With the January 15th deadline for having these in the docket looming, we could use comments as soon as you're able.

Attached is a recently updated version of the PID with some changes from the previous version.

_____
Steven Snyderman, Chemical Review Manager
Pesticide Re-evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
Snyderman.Steven@epa.gov
(703) 347-0249

-----Original Message-----
From: Snyderman, Steven
Sent: Friday, December 13, 2019 3:20 PM
To: Perlis, Robert <Perlis.Robert@epa.gov>; Huskey, Angela <Huskey.Angela@epa.gov>; Knorr, Michele <Knorr.Michele@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>
Cc: Mannix, Marianne <Mannix.Marianne@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Khan, Matthew <khan.matthew@epa.gov>; Ross, Philip <Ross.Philip@epa.gov>
Subject: RE: neonics OGC attorney

Good afternoon all,

Phil recommended that we forward along the imidacloprid PID (other PIDs to come) to the OGC neonicotinoid team for review. The rest of the team has already had an opportunity to weigh in on imi and your comments are welcome.

If you're going to focus on any sections, I think that it's probably best for you to focus on our rationale for risk mitigation in Section IV. Proposed Interim Registration Review Decision, pages 34 - 65. Obviously we expect this to be fairly high profile when it post and we hope to continue conversations on potential public concerns during the public comment period.

If you have any questions, please feel free to reach out to me.

_____
Steven Snyderman, Chemical Review Manager Pesticide Re-evaluation Division Office of Pesticide Programs
Environmental Protection Agency Snyderman.Steven@epa.gov
(703) 347-0249

-----Original Message-----
From: Ross, Philip <Ross.Philip@epa.gov>
Sent: Thursday, December 12, 2019 10:55 AM
To: Perlis, Robert <Perlis.Robert@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>
Cc: Huskey, Angela <Huskey.Angela@epa.gov>; Knorr, Michele <knorr.michele@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>
Subject: RE: neonics OGC attorney

Attorney Client Communication
Attorney Work Product
Deliberative
Enforcement Sensitive
Privileged and Confidential
Do Not Release

I suggested to them (Steven Snyderman, Dana and others) yesterday that they run my markup I sent them yesterday by whomever in OGC normally counsels them about neonic matters.

I'll repeat that to them when I review and complete review of another that's on my desk.

FYI--Bob--I look at what's sent to me--irrespective of whether it's general text or chemical or issue specific text.

Philip J. Ross
Senior Attorney
Office of General Counsel
United States Environmental Protection Agency
(202) 564-5637

-----Original Message-----
From: Perlis, Robert <Perlis.Robert@epa.gov>
Sent: Thursday, December 12, 2019 10:43 AM
To: Friedman, Dana <Friedman.Dana@epa.gov>
Cc: Huskey, Angela <Huskey.Angela@epa.gov>; Knorr, Michele <knorr.michele@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Ross, Philip <Ross.Philip@epa.gov>
Subject: RE: neonics OGC attorney

Dana:

Good news and bad news. The good is that Angela Huskey, Michele Knorr, and Erin Koch are my neonic team (Mark was as well, but he has sadly flown the coop). They're all very good, and relatively fungible on neonic issues. The bad news is that they're all hopeless swamped - Michele and Erin with time-sensitive administrative record issues in litigation, and Angela with a chemical you used to know pretty well... In addition to sending neonic PIDs to Phil, please send them to Angela, Michele and Erin (and me as well, I guess), and we'll figure out who, in addition to Phil, should be looking at these PIDs? Just to help us with our resources, is it obvious from looking at the PIDs, or can you identify those portions that our neonic folks should concentrate on (Phil would be doing a broader review, but would not be doing a detailed review of neonic issues)? Appreciate any help you can give us in pinpointing where the neonic folks should concentrate their efforts. Thanks, and please let me know if you have any questions...

Bob

Bob Perlis
Pesticides and Toxic Substances Law Office Office of General Counsel US EPA
(202) 564-5636

-----Original Message-----
From: Friedman, Dana <Friedman.Dana@epa.gov>
Sent: Thursday, December 12, 2019 9:51 AM
To: Perlis, Robert <Perlis.Robert@epa.gov>
Subject: neonics OGC attorney

Bob,

I just wanted to check in to see if there's an attorney designated for neonic issues. We have the PIDs going around for team review, and while Phil reviewed imidacloprid for us already per our usual review process, we wanted to make sure there's no one else who needs to take a look.

I should note, timing on this is pretty limited (I know, you're shocked) - we're trying to get our reviews done before everyone is out for the holidays (by the 20th). FR publication by mid-January at latest.

Many thanks,
Dana

Dana L. Friedman
Chief, Risk Management and Implementation Branch I Pesticide Re-evaluation Division Office of Pesticide Programs U.S. Environmental Protection Agency
703-347-8827