Message

From: Holmes, Jean [Holmes.Jean@epa.gov]
Sent: 1/4/2021 8:57:55 PM
To: Steeger, Thomas [Steeger.Thomas@epa.gov]
Subject: FW: Neonic PID-RTC - question for EFED management
Attachments: Xerces - 20200618 - Comment - EPA-HQ-OPP-2008-0844-1843.pdf

Hi Tom,

Given what we know about the seed treatment issue are you Ok with EFED's response below or do you have any suggested revisions?

Thanks

Jean

From: Matuszko, Jan <Matuszko.Jan@epa.gov>
Sent: Monday, January 04, 2021 3:10 PM
To: Holmes, Jean <Holmes.Jean@epa.gov>
Subject: FW: Neonic PID-RTC - question for EFED management

From: Wait, Monica <Wait.Monica@epa.gov>
Sent: Tuesday, December 22, 2020 11:09 AM
To: Steeger, Thomas <Steeger.Thomas@epa.gov>; Matuszko, Jan <Matuszko.Jan@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>
Cc: Garber, Kristina <Garber.Kristina@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Spatz, Dana <Spatz.Dana@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>; Mroz, Ryan <Mroz.Ryan@epa.gov>
Subject: Neonic PID-RTC - question for EFED management

Hello Tom, Jan, and Brian,

As you may be aware, the 4 neonic teams are developing a response to comment document, following the public comment period earlier this year on the neonic PIDs and revised reg review risk assessments. We have been coordinating across the 4 neonic teams and acetamiprid, and discussed today that the comment and proposed response below, should be raised to EFED management. We will also flag this issue in the draft RTC document when it comes for your review, but thought it warranted a separate email to get on your radar.

Please let us know if you have any proposed revisions to the EFED Response below, or let me know if you'd like to meet to talk about it. It seems like this issue is still in flux, but if you have any suggestions, please let us know. The original public comment that raised this issue in the imidacloprid docket is also attached.

> **Summarized public comments regarding disposal and processing** – EPA must analyze and address substantial harms resulting from use and disposal of pesticide-treated seeds via ethanol processing plants. EPA undervalues cost of environmental risks. The public comment states that EPA does not adequately regulate disposal of pesticide-treated seed, since seed is not regulated as a pesticide. However, pesticide-treated seed is widely used and has negative ecosystem effects. The public comment states that ethanol facilities present concern for environmental exposures when they use excess pesticide-treated seed, which can contaminate nearby waterways and ecosystems and

through holding ponds and byproducts (provides stats of concentrations found in appendix), in addition to dust-off concerns, appears to be leading to bee kills nearby.

EFED Response:

Deliberative Process / Ex. 5

Thanks,

Monica Wait
Risk Assessment Process Leader
OPP / EFED / ERB 6
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