Message

**From**: Lavoie, Emma [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=86AC7844F12646C095E4E9093A941623-LAVOIE, EMMA]
**Sent**: 1/3/2022 2:16:15 PM
**To**: Cascio, Wayne [Cascio.Wayne@epa.gov]
**Subject**: FW: Material for Jan 4 meeting on Earthjustice CRA/CIA letter
**Attachments**: 2021.11.22 Letter seeking meeting on cum risk guidelines.pdf; CRA Guidelines External Review Draft.docx; CRA CIA and Earthjustice Letter response for Jan 4 meeting - REVISED 12-22-21.docx

Full document set with earlier version of pager.

-Emma

---

Emma T. Lavoie, PhD
Tel: 703.472.6312

---

**From:** Deener, Kathleen <Deener.Kathleen@epa.gov>
**Sent:** Wednesday, December 22, 2021 2:30 PM
**To:** Ross, Mary <Ross.Mary@epa.gov>; Frey, Christopher <Frey.Christopher@epa.gov>; Cascio, Wayne <Cascio.Wayne@epa.gov>; Rodan, Bruce <rodan.bruce@epa.gov>; Pathirana, Gamachchi <Pathirana.Gamachchi@epa.gov>; Trentacoste, Emily <trentacoste.emily@epa.gov>; Perry, Dale <Perry.Dale@epa.gov>; Blackburn, Elizabeth <Blackburn.Elizabeth@epa.gov>
**Cc:** D'Amico, Louis <DAmico.Louis@epa.gov>; Penalva-Arana, Carolina <Penalva-Arana.Carolina@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>; Suarez, Danielle <Suarez.Danielle@epa.gov>; Matney, Rachel <Matney.Rachel@epa.gov>; Paul, Sean <paul.sean@epa.gov>
**Subject:** RE: Material for Jan 4 meeting on Earthjustice CRA/CIA letter

Hello All –

I am following up on Mary's email from December 17 regarding the internal EPA meeting scheduled for January 4 to discuss an approach to respond to the letter from Earthjustice on cumulative risk.

We have made an update to that pager that we sent forward on December 17. Given the media attention to the question of public comment on the cum risk guidelines, we have updated this document to include a second potential option for moving forward.

As a reminder, the original request from Mary was to review the pager, and if everyone is okay with it, that it be attached to the invite for the January 4 EPA meeting on this topic along with the letter from Earthjustice and the CRA Guidelines External Review Draft.

Thanks,

Kacee Deener, MPH (she/her/hers)
Office of Science Advisor Policy & Engagement
Office of Research and Development
U.S. Environmental Protection Agency
(mobile) 202.510.1490
deener.kathleen@epa.gov

**From:** Ross, Mary <Ross.Mary@epa.gov>
**Sent:** Friday, December 17, 2021 7:32 PM
**To:** Frey, Christopher <Frey.Christopher@epa.gov>; Cascio, Wayne <Cascio.Wayne@epa.gov>; Rodan, Bruce <rodan.bruce@epa.gov>; Pathirana, Gamachchi <Pathirana.Gamachchi@epa.gov>; Trentacoste, Emily <trentacoste.emily@epa.gov>; Perry, Dale <Perry.Dale@epa.gov>; Blackburn, Elizabeth <Blackburn.Elizabeth@epa.gov>
**Cc:** Deener, Kathleen <Deener.Kathleen@epa.gov>; D'Amico, Louis <DAmico.Louis@epa.gov>; Penalva-Arana, Carolina <Penalva-Arana.Carolina@epa.gov>
**Subject:** Material for Jan 4 meeting on Earthjustice CRA/CIA letter

Greetings, ORD senior leaders. About a week ago, we discussed the Earthjustice letter on cum risk guidelines and cum impact assessment. IOAA scheduled a meeting on Tuesday, January 4 with senior leaders from other EPA offices to discuss strategy.

We've revised and updated the pager we sent for our ORD meeting to support the January 4 meeting and have attached that draft here. I'm not following the IOAA SOP because many people are out of the office, I'm sending directly to the principals and copying others. Would you be able to review and comment on this draft by January 3 so it can be attached to the Jan 4 meeting invitation?

The Earthjustice letter is already attached to the invitation and I'm attaching it here as well. We also suggest attaching the draft CRA guideline document that is the subject of the letter and some recent trade press. We'd like to share it with EPA colleagues; it's not as big a deal as it seems in the trade press articles.

Apologies for sending this just before the holidays!

Mary Ross, PhD
Director, Office of Science Advisor, Policy and Engagement
Office of Research and Development
Washington DC 20460
202-564-8379
mobile 571-255-0127

**From:** Blackburn, Elizabeth <Blackburn.Elizabeth@epa.gov>
**Sent:** Monday, November 22, 2021 12:28 PM
**To:** Ross, Mary <Ross.Mary@epa.gov>; Deener, Kathleen <Deener.Kathleen@epa.gov>
**Cc:** Lavoie, Emma <Lavoie.Emma@epa.gov>; D'Amico, Louis <DAmico.Louis@epa.gov>
**Subject:** FW: request for meeting on cumulative risk guidelines

Hi Mary and Kacee

See request below. We'd like to strategize about next steps.

Liz

Liz Blackburn (she/her/hers)
Chief of Staff
EPA Office of Research and Development

202-564-2192
Mobile: 202-436-2453

**From:** Frey, Christopher <Frey.Christopher@epa.gov>
**Sent:** Monday, November 22, 2021 12:20 PM
**To:** Blackburn, Elizabeth <Blackburn.Elizabeth@epa.gov>; Suarez, Danielle <Suarez.Danielle@epa.gov>
**Cc:** Hubbard, Carolyn <Hubbard.Carolyn@epa.gov>; Cascio, Wayne <Cascio.Wayne@epa.gov>; Robbins, Chris <Robbins.Chris@epa.gov>; Rodan, Bruce <rodan.bruce@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>
**Subject:** FW: request for meeting on cumulative risk guidelines

Hello Liz and Danielle:

This just came through. Given the subject matter, which is a guideline being developed under the RAF, this seems to be in the realm of the Chief Scientist. Thus, I am thinking that Wayne would be the right person from ORD to be involved in this conversation.

Chris

**From:** Eve C. Gartner <egartner@earthjustice.org>
**Sent:** Monday, November 22, 2021 11:57 AM
**To:** Carbonell, Tomas <Carbonell.Tomas@epa.gov>; Frey, Christopher <Frey.Christopher@epa.gov>; Cascio, Wayne <Cascio.Wayne@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Gillespie, Andrew <Gillespie.Andrew@epa.gov>
**Cc:** Tejada, Matthew <Tejada.Matthew@epa.gov>; Briskin, Jeanne <Briskin.Jeanne@epa.gov>; Hoffer, Melissa <Hoffer.Melissa@epa.gov>; Engelman-Lado, Marianne <EngelmanLado.Marianne@epa.gov>; echeuse@earthjustice.org
**Subject:** request for meeting on cumulative risk guidelines

Dear Dear Messrs. Carbonell, Frey, Cascio, Dawson and Gillespie,

The undersigned groups and individuals write to seek a meeting with you regarding cumulative risk assessment in light of recent reporting that the EPA is advancing work on a new document titled "Guidelines for Cumulative Risk Assessment Planning and Problem Formulation," and that the Agency is evaluating its current legal authority to address cumulative risks and impacts.

We appreciate that you have a lot on your plates, however this is a matter of utmost importance to our organizations and their members, and one that EPA must get right in order to protect public health and advance the Biden-Harris Administration's stated goal of environmental justice.

If you are able to provide a few dates and times, we will get back to you promptly with a time that works for us.

We are very grateful for the work you are doing and look forward to meeting with you before the end of the year. Happy Thanksgiving!

Best,

Eve Gartner, Managing Attorney
Emma Cheuse, Senior Attorney
Michelle Mabson, MPH, MSc., Staff Scientist
Rashmi Joglekar, PhD, Staff Scientist
Earthjustice

Mily Treviño, Executive Director
Alianza Nacional de Campesinas

Jane Williams, Executive Director
California Communities Against Toxics

Michele Roberts, National Co-Coordinator
Stephanie Herron, National Organizer
Environmental Justice Health Alliance for Chemical Policy Reform

Wilma Subra, Technical Advisor
Louisiana Environmental Action Network

Leslie Fields, National Director, Policy Advocacy and Legal
Sonya Lunder, Senior Toxics Policy Advisor
Sierra Club

Juan Parras, Executive Director
Texas Environmental Justice Advocacy Services (t.e.j.a.s.)

Andrew A. Rosenberg, Director, Center for Science and Democracy
Union of Concerned Scientists

Andrea Delgado, Government Affairs Director
Eriberto Fernández, Deputy Director for Government Affairs
United Farmworkers Foundation

---

Eve C. Gartner (she/hers)
Managing Attorney, Toxic Exposure & Health Program
Earthjustice
48 Wall Street
New York, NY 10005
212-845-7381
Earthjustice.org

EARTHJUSTICE
BECAUSE THE EARTH NEEDS A GOOD LAWYER

The information contained in this email message may be privileged, confidential and protected from disclosure.
If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited.
If you think that you have received this email message in error, please notify the sender by reply email and delete the message and any attachments.