Message

From: Saunders, Jennifer [Saunders.Jennifer@epa.gov]
Sent: 4/6/2022 9:59:19 AM
To: Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Aubee, Catherine [Aubee.Catherine@epa.gov]
Subject: FW: Discuss PFAS OD briefing for PQZ and Broflanilide

FYI, some information about PQZ and broflanilide, we had a good discussion yesterday, Steve was really helpful.

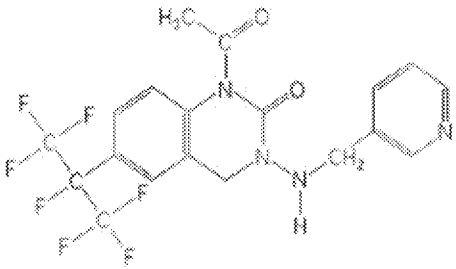
From: Wente, Stephen <Wente.Stephen@epa.gov>
Sent: Tuesday, April 5, 2022 3:36 PM
To: Fertich, Elizabeth <fertich.elizabeth@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Savoia, Pete <Savoia.Pete@epa.gov>; Britton, Wade <Britton.Wade@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Orrick, Greg <Orrick.Greg@epa.gov>; Khan, Faruque <Khan.Faruque@epa.gov>; Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>; Dunbar, Anwar <Dunbar.Anwar@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Milians, Karen <Milians.Karen@epa.gov>; Farruggia, Frank <Farruggia.Frank@epa.gov>
Cc: Bohaty, Rochelle <Bohaty.Rochelle@epa.gov>; Bloem, Thomas <Bloem.Thomas@epa.gov>; Yang, Yung <Yang.Yung@epa.gov>; Hawkins, Monica <Hawkins.Monica@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Gardner, David <Gardner.David@epa.gov>
Subject: RE: Discuss PFAS OD briefing for PQZ and Broflanilide

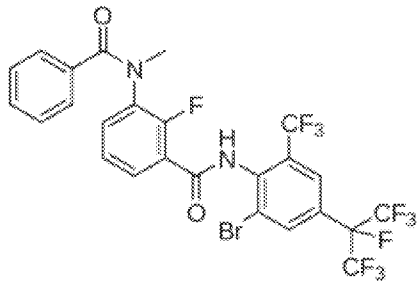
The email chain below discusses the points that were made about PQZ breaking down, but the PFAS side chain of the chemical potentially sticking around.

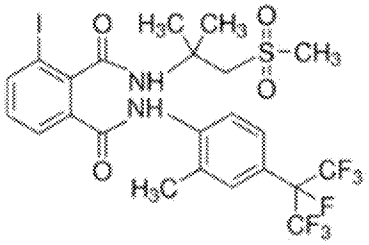
From: Wente, Stephen
Sent: Friday, March 25, 2022 11:56 AM
To: Bohaty, Rochelle Bohaty.Rochelle@epa.gov
Cc: Milians, Karen Milians.Karen@epa.gov; Federoff, Nicholas Federoff.Nicholas@epa.gov
Subject: RE: Quick question re: pyrifluquinazon

This email is in response to a question that Rochelle asked a while ago (see email chain below). Below are the definitions for PFAS from both OECD and OPPT from the OD briefing slides. It appears to me that the fluorinated side chain for PQZ, broflanalide, and flubendiamide (cancelled) would be PFAS chemicals as long as the bond that connects the PFAS sidechain to the rest of their respective molecules was not broken and reformed with a bond to a hydrogen atom. Even in this case (the rest of the molecule replaced with hydrogen), the sidechain as its own molecule would meet the OECD definition of PFAS, though that probably does not matter so much to EPA.

Ex. 5 Deliberative Process (DP)







Pyrifluquinazon Broflanilide Flubendiamide

PFAS OPPT vs. OECD definitions

- OPPT PFAS working definition for TSCA purposes:
  - **CF_2R-CFR'R" where R, R', R" do not equal H**
- Newly revised OECD PFAS definition[1/]
  - PFASs are defined as fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without any H/Cl/Br/I atom attached to it), i.e., with a few noted exceptions, any chemical with at least a perfluorinated methyl group ($-CF_3$) or a perfluorinated methylene group ($(-CF_2-)$ is a PFAS.
- Pyrifluquinazon chemical structure includes a CF_3-CF(R)-CF_3 moiety, and as such meets both the OPPT and newly revised OECD definition of a PFAS

1/Reconciling Terminology of the Universe of Per- and Polyfluoroalkyl Substances: Recommendations and Practical Guidance (July 9, 2021)

From: Bohaty, Rochelle <Bohaty.Rochelle@epa.gov>
Sent: Wednesday, March 9, 2022 1:39 PM
To: Wente, Stephen <Wente.Stephen@epa.gov>
Cc: Milians, Karen <Milians.Karen@epa.gov>
Subject: RE: Quick question re: pyrifluquinazon

Steve,

Is the side-chain (as an individual compound) that results in giving pyrifluquinazon the PFAS classification considered PFAS? Does my question make sense? It is listed in toxics PFAS chemicals that it has done assessments?

Rochelle F. H. Bohaty, PhD, Acting Branch Chief
Environmental Risk Branch 2
Environmental Fate and Effects Division

Office of Pesticide Programs
U.S. Environmental Protection Agency

From: Wente, Stephen <Wente.Stephen@epa.gov>
Sent: Wednesday, March 9, 2022 1:02 PM
To: Stephenson, Rachel S. <stephenson.rachel@epa.gov>
Cc: Nguyen, Khue <Nguyen.Khue@epa.gov>; Bohaty, Rochelle <Bohaty.Rochelle@epa.gov>
Subject: RE: Quick question re: pyrifluquinazon

Ex. 5 Deliberative Process (DP)

From: Stephenson, Rachel S. <stephenson.rachel@epa.gov>
Sent: Wednesday, March 9, 2022 12:08 PM
To: Wente, Stephen <Wente.Stephen@epa.gov>
Cc: Nguyen, Khue <Nguyen.Khue@epa.gov>
Subject: Quick question re: pyrifluquinazon

Hi Stephen,

I just had a quick question for you regarding Pyrifluquinazon data. During our team meeting, we had discussed the possibility of asking for a radiolabeled study to round out the database. I recall that you had specifically spoken about this during the meeting, so I wanted to clarify with you what type of radiolabeled study EFED would need.

I'm asking because I plan on sending out the meeting notes today and wanted to be sure that I had the correct information in there before sending out to the team.

Thanks,

Rachel Stephenson
Chemical Review Manager
U.S. EPA/OCSPP/PRD/RMIB 5
Stephenson.rachel@epa.gov
(202) 566-2363