Message

From: Aubee, Catherine [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=18E81C76BBA145F1948ED5641919DEB1-AUBEE, CATHERINE]
Sent: 2/4/2021 8:29:33 PM
To: Leifer, Kerry [Leifer.Kerry@epa.gov]
Subject: Fwd: PRIA Code Confirmation for Anticipated Submission on Containers

FYI

Best,
Catherine
Associate Director
OPP Registration Division
US Environmental Protection Agency

Begin forwarded message:

From: "Saunders, Jennifer" <Saunders.Jennifer@epa.gov>
Date: February 3, 2021 at 9:05:54 AM EST
To: "Aubee, Catherine" <Aubee.Catherine@epa.gov>, "Echeverria, Marietta" <Echeverria.Marietta@epa.gov>
Subject: FW: PRIA Code Confirmation for Anticipated Submission on Containers

Just an FYI.

From: Karen Larson <klarson@clarke.com>
Sent: Wednesday, February 03, 2021 8:51 AM
To: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Subject: RE: PRIA Code Confirmation for Anticipated Submission on Containers

Thank you Jackie,

This is a helpful checklist for our team. Early next week I will send you a list of registration numbers as we work within PSP for submission next week. The first group of product & package testing is complete this week, pending completion of the GLP QAU review of the data early.

Best regards,
Karen

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Tuesday, February 2, 2021 6:54 PM
To: Karen Larson <klarson@clarke.com>
Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Subject: PRIA Code Confirmation for Anticipated Submission on Containers

Hi Karen,

Thank you for meeting with us on 1/25 to discuss Clarke's anticipated submission for use of non-fluorinated containers moving forward. We understand that you will soon be submitting

information confirming the container is PFAS-free and submitting a "worst-case scenario" storage stability study in the new container to support relevant products. Based on the information you provided during the meeting, the package can be submitted as an R340. Please ensure the following information is included in your submission package:

- Description and rationale of your testing strategy, particularly justifying how the testing regime represents the "worst case scenario," as you discussed at the meeting
- Information on the composition of the alternative container
- Detailed testing methodology

As noted during our call, we will not be able to confirm the acceptability of your submission until it is reviewed; the submission of the aforementioned items will better inform our evaluation.

We understand that the studies are currently underway. If you plan to conduct additional studies in the future, we strongly recommend that you consult with the Agency prior to testing.

If you have any questions for me or the team, please let me know.

Many thanks,
Jackie

Jacquelyn Herrick, PM 3
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