Message

From: Aubee, Catherine [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=18E81C76BBA145F1948ED5641919DEB1-AUBEE, CATHERINE]
Sent: 5/14/2021 3:38:52 PM
To: Saunders, Jennifer [Saunders.Jennifer@epa.gov]; Herrick, Jacquelyn [Herrick.Jacquelyn@epa.gov]
CC: Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Koch, Erin [Koch.Erin@epa.gov]; Leifer, Kerry [Leifer.Kerry@epa.gov]
Subject: Posting of letters for container amendments re: PFAS
Attachments: 8329-42-20210419.pdf; 8329-62, -82, -106, -108-20210412.pdf

Hi Jenn and Jackie:

During out last PFAS coordination meeting, there was a suggestion to make all of the relevant acceptance letters for container substitutions publicly available, e.g., by posting on PPLS. We have three asks:

1) Can you confirm (working with others as needed) that the letters are free of FIFRA CBI?
2) Can they be put in the queue for PPLS uploading, simply noting that there is no revised label associated with the action/letter?
3) For the Monday meeting with Maryland, can we provide the acceptance letter(s) for Anvil 10+10 to them directly, once confirmed that there is no CBI?

What else should be considered? Thanks in advance for your help.

Best,
Catherine

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Friday, April 30, 2021 9:11 AM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Cc: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Subject: RE: Biomist Adulticide

Hi all,

The approval letter is attached. Typically only labels get posted to PPLS, so this one wont be on there.

Thanks,
Jackie

Jacquelyn Herrick, PM 3
Invertebrate-Vertebrate Branch 1
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0559
herrick.jacquelyn@epa.gov

From: Keigwin, Richard <Keigwin.Richard@epa.gov>
Sent: Friday, April 30, 2021 9:07 AM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>

Cc: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Subject: RE: Biomist Adulticide

Might be helpful for OPP to work with OPS and Region 3 to get a call scheduled. Ideally, the call would be with both Maryland Department of Ag and Maryland Department of the Environment.

Is this the type of approval that would be posted to PPLS at some point?

From: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Sent: Friday, April 30, 2021 7:50 AM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>
Cc: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Subject: RE: Biomist Adulticide

Yes, we approved the new container type for the Biomist 30+30 ULV (reg. no 8329-42) which is the specific product Clarke said is in question. I am copying Jackie in case you need more information.

Also, let us know If you would like RD to participate in a call with MD.

Thanks,
Marietta

From: Keigwin, Richard <Keigwin.Richard@epa.gov>
Sent: Thursday, April 29, 2021 7:09 PM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Cc: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Subject: Re: Biomist Adulticide

Thanks for sharing this information. Am I reading the email correctly to say that we've reviewed the referenced data in the context of the Biomist products? If the answer is yes, then this could inform how we respond to subsequent inquiries. Am also wondering if we should have a follow-up conversation with Maryland.

Rick Keigwin
Acting Deputy Assistant Administrator for Management
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Phone: 202-564-2910
Sent from my iPhone (Please excuse typos!)

> On Apr 29, 2021, at 4:27 PM, Echeverria, Marietta <Echeverria.Marietta@epa.gov> wrote:
>
> See Clarke's response below.

From: Karen Larson <klarson@clarke.com>
Sent: Thursday, April 29, 2021 4:15 PM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Subject: RE: Biomist Adulticide

Hi Marietta,

Thank you for your call and note. As I explained by phone, we are not aware of any testing that shows PFAS contamination in Biomist adulticides. We have not done any product testing with Biomist, though have confirmed by testing that our new Baritainer® containers and our un-fluorinated HDPE containers do not have the potential to leach PFAS into the product. We've submitted those test reports to RD and recently received approval for the Biomist adulticides.

We have not distributed any product in the fluorinated containers since the start of the year. In late January, Clarke initiated a voluntary Product Exchange Program for all of its products, and have collected product in fluorinated containers from our customers. We are currently refilling these orders with fresh production in steel, non-fluorinated HDPE, and in the new Baritainer® barrier-resin containers.

Best regards,
Karen

Karen J. Larson
Vice President, Product Innovation & Government Affairs

Office : 630-671-3123
Email: klarson@clarke.com

675 Sidwell Ct. | St. Charles, IL 60174
www.clarke.com

From: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Sent: Thursday, April 29, 2021 2:52 PM
To: Karen Larson <klarson@clarke.com>
Subject: Biomist Adulticide

Hi Karen,

Following up on the voice message I left you, we have received an inquiry from PEER and from the Maryland Department of Agriculture regarding potential contamination of the Biomist Adulticide product. Is Clarke aware of any testing that shows PFAS contamination of the product? Is Clarke conducting any testing to ensure that the product does not contain PFAS contamination? Thank you.

Regards,
Marietta

Marietta Echeverria, Acting Director
Registration Division
Office of Pesticide Programs

Office of Chemical Safety and Pollution Prevention
703-305-8578

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