Message

From: Nesci, Kimberly [Nesci.Kimberly@epa.gov]
Sent: 4/5/2021 7:46:04 PM
To: Echeverria, Marietta [Echeverria.Marietta@epa.gov]
Subject: FW: SFIREG JWC Mtg: PFAS & Dicamba Questions for EPA

So you have this – will be easier to look at once we get a comprehensive file, though.

From: Nesci, Kimberly
Sent: Monday, April 5, 2021 8:28 AM
To: ONeill, Sandra <ONeill.Sandra@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>
Subject: RE: SFIREG JWC Mtg: PFAS & Dicamba Questions for EPA

I think your plan works, Sandra. Thuy and Yaorong, what do you think? I plan to be present for both of these. Ed, Mike, Neil, Marietta, Catherine Aubee, Kerry Leifer (on the inerts question) and Tala should also be invited, and then Tala can include others from OPPT as needed.

Also, thanks for reaching out to the comms folks on the questions. Do you think you could put all of the qs and As into a share document (and get the approved responses from Rhina that she notes below) for our use? Or would that be Comms role? Not sure. I do know Thuy and Yaorong have technical responses to the blue questions, so I expect on those they can speak freely during the meeting, as they've done for other stakeholder outreach conversations. The inert questions are RD questions, hence the invite to RD above.

From: ONeill, Sandra <ONeill.Sandra@epa.gov>
Sent: Friday, April 2, 2021 2:26 PM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>
Subject: RE: SFIREG JWC Mtg: PFAS & Dicamba Questions for EPA

Hi Kimberly, Thuy and Yaorong,

Hope you'll be able to enjoy today's sun (albeit with cold winds)!

We've got an updated draft agenda for the SFIREG Joint Working Committee. PFAS is noted for two sessions – one on April 12th from 1 – 2:45 PM and one on April 13th from 11:30 – 1:00 PM. Those both are on the lengthy side. I inquired with SFIREG on what the difference is between the two sessions, the response was that the first session is more general and the second session is to dig a bit more into the rinsate data, and talk about the lab work that is being done, with a focus on more of the technical topics. The second session will also be shared with Hotze Wijnja from MA. The agenda does say under the first session "see questions" so perhaps the first session is then to answer what questions we have answers for.

Based on the submitted questions, I think it may be good to include BEAD, and also some key folks from RD and OECA in the first session, and BEAD folks in the second. But wanted to touch base with you all to get your thoughts on who to invite to participate in these sessions.

I know you're all completely tied up with PFAS, among all other hot topics, so please let me know if there's anything I can do to further assist with coordination.

Thanks, and if we don't talk before Monday, a good weekend as well!

Sandra O'Neill
919 323 7926

From: ONeill, Sandra
Sent: Friday, April 2, 2021 1:43 PM
To: Lara, Rhina <Lara.Rhina@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>
Cc: Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: RE: SFIREG JWC Mtg: PFAS & Dicamba Questions for EPA

Greetings all,

A big thanks to Rhina for the PFAS questions breakdown! Can we assume that for the first group where responses were sent, those are already approved as well? Appreciate the offer to share those responses, I think it'd be good for BEAD/RD to have these if they don't already.

Sounds like we're good on the third group of questions that can be answered with existing questions as well.

For the 2nd group of questions, wondering if the 2nd group that's drafted might be approved by 4/12 when the SFIREG Joint Working Committee meeting takes place? If not, we could just inform that we're working on those.

For the 4th group where there are no drafts, I've noted the divisions I think might be lead (in blue below), but for the group, please feel free to correct! Here again, not sure if we'll get clearance in advance of the SFIREG JWC.

Lastly, we've received an updated draft agenda for the SFIREG Joint Working Committee meeting. There are two PFAS sessions, and I'll follow up with BEAD and OECA on thoughts for speakers at those sessions.

Many thanks and a happy Friday to all!

Sandra O'Neill
919 323 7926

From: Lara, Rhina <Lara.Rhina@epa.gov>
Sent: Thursday, April 1, 2021 4:30 PM
To: ONeill, Sandra <ONeill.Sandra@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>
Cc: Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: RE: SFIREG JWC Mtg: PFAS & Dicamba Questions for EPA

Hi Sandra,

Thanks for sending these over. Looking at these questions, we have answered some of these in the past because they have come through our PFAS in Packaging inbox. I've divided the questions in categories so that we know what we have already worked on and what information is already out there.

Received through PFAS packaging inbox, response was sent – Let me know if you'd like me to share these responses with you.

- Will affected products be placed under Stop Sale/Stop Use by EPA or State Lead Agencies?
- Is there a Safety Data Sheet (SDS) for the packaging?
- After Anvil 10+10 is properly mixed (diluting the concentrate) and applied at the maximum label rate, what level of PFAS is making it into the environment?
- Will there be a foreseeable interruption in supply and inventory if the science leads to a change in fluorinated HDPE containers?
- What are the positions of other governments and trade partners, including Canada, Mexico, and the European Union, on PFAS? Are levels of concern or action levels established in other countries?
- What will this mean for export/import of agrichemical products? What will this mean for the import/export of agricultural crops that were treated with agrichemicals stored in fluorinated HDPE packaging?
- Other than Anvil 10+10, what other packaging/products are affected, including those that may go beyond the agrochemical industry such as in the food industry or homeowner products? Can a list be provided?

Received through PFAS packaging inbox, response drafted and undergoing approval process

- What is the definition of a PFAS compound in the context of pesticides?
- According to the EPA PFAS Master List, comprising a master list of PFAS chemicals, https://comptox.epa.gov/dashboard/chemical_lists/pfasmaster several pesticide active ingredients such as Lufenuron, Noviflumuron, Tetraconazole, Pyrifluquinazon are listed as PFAS chemicals, however the webpage states that there is no clear definition of PFAS chemical. An excerpt from the webpage :"There is no precisely clear definition of what constitutes a PFAS substance given the inclusion of partially fluorinated substances, polymers, and ill-defined reaction products on these various lists. Hence, PFASMASTER serves as a consolidated list of substances spanning and bounded by the below lists, defining a practical boundary of PFAS chemical space (within DSSTox) of current interest to researchers and regulators worldwide. This PFAS Master List will continue to expand as component lists grow. (Last Updated: September 16th 2020)". Are the active ingredients listed actually PFAS chemicals?
- What should be done with remaining stocks of Anvil 10+10? Can more information be provided on the registrant's response?
- Will there be a similar response from EPA regarding Permanone 30-30?

New questions that can be answered with existing language – no need to undergo approval process

- If PFAS contamination is confirmed to be linked to the fluorination process, what are the alternatives to fluorination or alternative types of rigid containers available to the agrochemical

Ex. 5 Deliberative Process (DP)

- Methods used for determination. Will BEAD be sharing their validated methods with states?

Ex. 5 Deliberative Process (DP)

- EPA has indicated a "clean up" of PFAS in the Pesticide Inert Finder database as the database includes some PFAS compounds. EPA further indicated that even though these compounds

were listed, they do not occur in currently registered pesticide products (this was information relayed in a presentation to Massachusetts mosquito control districts earlier this year). Could

Ex. 5 Deliberative Process (DP)

New questions that need responses drafted – will need to undergo the approval process

- Mixed messages between the Ft. Meade lab stating they need more data to draw any conclusions regarding PFAS coming from the container vs. action being taken on the containers and targeting them as the source of the PFAS. BEAD/OECA?
- What containers are being purchased off the open market for additional testing by BEAD/Ft. Meade and are they the same level of fluorination as the initial container rinsate testing? If not, is there reason similar containers are not being used to perform the leaching studies? BEAD?
- Are there continued considerations being given regarding SLA laboratories providing analytical support? If so, what are they? BEAD?
- What consideration, if any, is being given to pesticide container recycling programs in regards to the fluorinated HDPE containers? Not sure if this is OCSPP
- EPA Methods 537.1 and 533 are established and being used with some differences between them. What methodology would be appropriate for testing? BEAD?

Hope this helps in providing a status as to where we are with all of these inquiries. Let me know if you have any questions!

Best,
Rhina M. Lara *(she/her/hers)*
Communications Branch
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Phone: (202) 815- 5722

From: ONeill, Sandra <ONeill.Sandra@epa.gov>
Sent: Wednesday, March 31, 2021 9:11 PM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>
Cc: Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Rosenblatt, Daniel

<Rosenblatt.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>
Subject: RE: SFIREG JWC Mtg: PFAS & Dicamba Questions for EPA

Thanks, Kimberly for the quick response and good question on clearances. For the SFIREG meetings, each division pursues clearance of any materials (talking points/presentations, etc.).

In the case of PFAS, since there's a mailbox set up for incoming questions, wondering if there might already be prepared responses to some of these questions (or similar questions).

Shamus/Rhina, might this be the case for any of the questions below? If so, would be a good to use any pre-cleared responses.

Thanks,

Sandra O'Neill
919 323 7926

From: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Sent: Wednesday, March 31, 2021 4:28 PM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>
Cc: Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; ONeill, Sandra <ONeill.Sandra@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>
Subject: FW: SFIREG JWC Mtg: PFAS & Dicamba Questions for EPA

FYI, we just rec'd from Sandra some advance questions from SFIREG on PFAS. I've added my initial thoughts in blue, and highlighted questions on which we'll need input from others (RD, OPPT, IO).

Sandra, I don't have any follow-up for SFIREG, but are you pursuing the process for formal clearance?

Thanks,
Kimberly

From: ONeill, Sandra <ONeill.Sandra@epa.gov>
Sent: Wednesday, March 31, 2021 1:53 PM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Cc: Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>
Subject: SFIREG JWC Mtg: PFAS & Dicamba Questions for EPA

Hi Kimberly, Marietta, Dan and all

As a follow-up to the 3/10 SFIREG Joint Working Committee walk-through meeting, SFIREG has sent questions for the PFAS and Dicamba sessions (SFIREG JWC to take place April 12-13). We've informed SFIREG that EPA goes through clearance processes for questions submitted in advance, and these may not have arrived in time to get senior level clearance. If that's the case for these questions, may be good to plan for a back pocket response appropriate for a public meeting, offering a full response at a later time to give time for clearances.

FYI: We have not yet received an updated agenda from SFIREG. We've also passed on Pentachlorophenol questions to AD.

Please let me know if you may have any questions/comments on the submitted questions and I'll coordinate with SFIREG.

Many thanks,

Sandra O'Neill
AAPCO/SFIREG Project Officer and EPA Region and State Liaison
Environmental Protection Agency
Office of Chemical Safety and Pollution Prevention
Office of Program Support
Mission Support Division
Intergovernmental & Community Relations Branch
919 323 7926

PFAS

During the joint session on Monday, could EPA address the following:

- What is the definition of a PFAS compound in the context of pesticides?

Ex. 5 Deliberative Process (DP)

- Mixed messages between the Ft. Meade lab stating they need more data to draw any conclusions regarding PFAS coming from the container vs. action being taken on the containers and targeting them as the source of the PFAS

Ex. 5 Deliberative Process (DP)

- What containers are being purchased off the open market for additional testing by BEAD/Ft. Meade and are they the same level of fluorination as the initial container rinsate testing?
- If not, is there reason similar containers are not being used to perform the leaching studies?

Ex. 5 Deliberative Process (DP)

- According to the EPA PFAS Master List, comprising a master list of PFAS chemicals, https://comptox.epa.gov/dashboard/chemical_lists/pfasmaster several pesticide active ingredients such as Lufenuron, Noviflumuron, Tetraconazole, Pyrifluquinazon are listed as PFAS chemicals, however the webpage states that there is no clear definition of PFAS chemical. An excerpt from the webpage :"There is no precisely clear definition of what constitutes a PFAS substance given the inclusion of partially fluorinated substances, polymers, and ill-defined reaction products on these various lists. Hence, PFASMASTER serves as a consolidated list of substances spanning and bounded by the below lists, defining a practical boundary of PFAS chemical space (within DSSTox) of current interest to researchers and regulators worldwide. This PFAS Master List will continue to expand as

component lists grow. (Last Updated: September 16th 2020)". Are the active ingredients listed actually PFAS chemicals? RD

- EPA has indicated a "clean up" of PFAS in the Pesticide Inert Finder database as the database includes some PFAS compounds. EPA further indicated that even though these compounds were listed, they do not occur in currently registered pesticide products (this was information relayed in a presentation to Massachusetts mosquito control districts earlier this year). Could an update be given on the effort to clean up the inert database? RD
- What should be done with remaining stocks of Anvil 10+10? Can more information be provided on the registrant's response? RD
- Will there be a similar response from EPA regarding Permanone 30-30?

Ex. 5 Deliberative Process (DP)

- Other than Anvil 10+10, what other packaging/products are affected, including those that may go beyond the agrochemical industry such as in the food industry or homeowner products? Can a list be provided?

Ex. 5 Deliberative Process (DP)

- Will affected products be placed under Stop Sale/Stop Use by EPA or State Lead Agencies? TBD, EPA exploring all options.
- Is there a Safety Data Sheet (SDS) for the packaging? ? Suggest they ask the companies?
- If PFAS contamination is confirmed to be linked to the fluorination process, what are the alternatives to

Ex. 5 Deliberative Process (DP)

the options available to them.

- After Anvil 10+10 is properly mixed (diluting the concentrate) and applied at the maximum label rate, what level of PFAS is making it into the environment? Don't know this -
- Will there be a foreseeable interruption in supply and inventory if the science leads to a change in fluorinated HDPE containers? There may be?
- What are the positions of other governments and trade partners, including Canada, Mexico, and the European Union, on PFAS? Are levels of concern or action levels established in other countries? OPPT?
- What will this mean for export/import of agrichemical products? What will this mean for the import/export of agricultural crops that were treated with agrichemicals stored in fluorinated HDPE packaging? ???
- Are there continued considerations being given regarding SLA laboratories providing analytical

Ex. 5 Deliberative Process (DP)

- What consideration, if any , is being given to pesticide container recycling programs in regards to the fluorinated HDPE containers? ???

During the EQI breakout on Tuesday, the committee would like to continue discussions and address some additional topics:

- Methods used for determination. Will BEAD be sharing their validated methods with states? Yes, will be sharing with states and publicly
- EPA Methods 537.1 and 533 are established and being used with some differences between them. What methodology would be appropriate for testing? Yaorong/Thuy can easily handle during the SFIREG meeting.