Message

From: Freedhoff, Michal [Freedhoff.Michal@epa.gov]
Sent: 3/4/2021 9:37:32 PM
To: Ozmen, Shamus [Ozmen.Shamus@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]
CC: Dennis, Allison [Dennis.Allison@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Diaz, Catherine [Diaz.Catherine@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]; Drinkard, Andrea [Drinkard.Andrea@epa.gov]; Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]
Subject: RE: For Michal/Rick review: PFAS in Pesticide Packaging - E & E follow-up

Ex. 5 Deliberative Process (DP)

Michal Freedhoff, Ph.D.
Acting Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Freedhoff.michal@epa.gov

From: Ozmen, Shamus <Ozmen.Shamus@epa.gov>
Sent: Thursday, March 4, 2021 4:28 PM
To: Freedhoff, Michal <Freedhoff.Michal@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>
Cc: Dennis, Allison <Dennis.Allison@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Diaz, Catherine <Diaz.Catherine@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
Subject: RE: For Michal/Rick review: PFAS in Pesticide Packaging - E & E follow-up

Thank you Michal and Rick. We also just received two additional questions from E & E (third set) and these are on deadline for OPA/Ariel this evening so I'm including OPP IO for simultaneous review. Attached is the full set for reference.

11. ***Is EPA aware of any current uses of PFAS in pesticides as inert ingredients? For example, are PFAS being used as propellants?***

There are numerous definitions of PFAS, some which are quite broad and include any "man-made chemical with at least one fully fluorinated carbon atom." Regardless of chemical structure, ingredients in pesticide products are subject to a risk assessment process prior to approval. While some pesticide chemicals have fluorinated structures, currently registered pesticides do not contain inert ingredients that have structures or properties comparable to prominent PFAS. EPA continues to update its public-facing InertFinder database to remove legacy entries for chemicals that are not currently in use.

12. ***We heard from PEER that additional testing they conducted found PFAS in four pesticides other than Anvil 10+10. Because of the specific PFAS compounds found, they do not believe the barrels are the sole source of contamination. Does EPA have any comment on this?***

Currently, EPA has only tested samples of one pesticide product and cannot speculate on PEER findings without conducting its own testing and analysis of the data.

Thank you,

Shamus Ozmen
Communications Branch
Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency
Mobile: (571) 442-9844

From: Ozmen, Shamus
Sent: Wednesday, March 3, 2021 5:32 PM
To: Freedhoff, Michal <Freedhoff.Michal@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>
Cc: Dennis, Allison <Dennis.Allison@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Diaz, Catherine <Diaz.Catherine@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
Subject: For Michal/Rick review: PFAS in Pesticide Packaging

Michal and Rick,

Attached is the communications package for the PFAS in pesticide packaging data release planned for Friday including:
-Press Release (PR)
-Internal Q&As
-Web with external Q&A (clean and tracked changes to see where we are updating content)
-Talking Points for opening the special purpose calls

Following last week's press inquiry you reviewed (see attached), E & E News is keen on having a PFAS story. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

6. ***Can we assume from this that EPA will be sharing with us the actual levels found of the PFAS listed below?***

Yes, EPA's testing data will provide actual levels of PFAS from rinsate off of the fluorinated containers. In addition, EPA will also release data from the non-fluorinated containers for comparison.

7. ***Were these tests of barrels sourced from the barrel manufacturer, or the pesticide manufacturer?***

The data included in the report represent results from testing the following HDPE container samples submitted by the producer of the pesticide product.

8. ***How many types of PFAS did EPA test the barrels for?***

EPA tested for 26 PFAS (C4-C18).

9. ***We noticed that EPA found PFOA in the barrels, despite PFOA being phased out years ago. Does EPA have any indication of how PFOA, specifically, got in there? Could it possibly be an issue of legacy contamination of manufacturing equipment?***

Through testing, EPA has confirmed that PFOA is one of the PFAS created as a result of the fluorination process.

10. ***Does EPA have plans to test any HDPE barrels made by other manufacturers or used by other pesticides products?***

Yes, EPA is planning further testing of fluorinated HDPE barrels from other manufacturers sourced from the open market.

Thank you,

Shamus Ozmen
Communications Branch
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Mobile: (571) 442-9844