Message

From: Nesci, Kimberly [Nesci.Kimberly@epa.gov]
Sent: 7/6/2021 5:41:36 PM
To: Goodis, Michael [Goodis.Michael@epa.gov]
Subject: RE: Draft Blog on EPA Report PFAS in Plastic Pesticide Packaging

Clearly we have the same priority list today - lol

From: Goodis, Michael <Goodis.Michael@epa.gov>
Sent: Tuesday, July 6, 2021 1:41 PM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>
Cc: Nguyen, Thuy <Nguyen.Thuy@epa.gov>
Subject: RE: Draft Blog on EPA Report PFAS in Plastic Pesticide Packaging

Not sure if there are specific procedures for these situations.

We would like for them to **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

Is that OK?

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Acting Deputy Director for Programs
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
571-309-5497 (cell)

From: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Sent: Tuesday, July 06, 2021 11:07 AM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>
Cc: Messina, Edward <Messina.Edward@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>
Subject: FW: Draft Blog on EPA Report PFAS in Plastic Pesticide Packaging

Mike and Shamus, do we typically comment on these? Is there a process? It's EDF, and NGO, not the press, so I'm not sure of what typical procedures are.

From: Tom Neltner <tneltner@edf.org>
Sent: Monday, July 5, 2021 8:30 AM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Nguyen, ThuyT <Nguyen.ThuyT@epa.gov>
Cc: drmvma@gmail.com; Tom Neltner <tneltner@edf.org>; Tom Bruton <tom@greensciencepolicy.org>
Subject: Draft Blog on EPA Report PFAS in Plastic Pesticide Packaging

Drs. Nesci and Nguyen,

Thank you for the excellent report into PFAS in HDPE pesticide packaging! Maricel Maffini, GSPI's Tom Bruton, and I have explored the issue further and prepared the attached draft blog summarizing our finding. The blog is titled "Beyond paper: PFAS linked to common plastic packaging used for food, cosmetics, and much more"

We plan to publish Wednesday, COB and need comments by Wednesday morning. Since it is based on your report, I wanted to run the draft past you for your review is you are interested.

Tom

Results from an Environmental Protection Agency (EPA) investigation into PFAS-contaminated pesticides have much broader, concerning implications for food, cosmetics, cleaning products, and other consumer products, as well as recycling. This investigation, first announced in January, found that fluorinated high-density polyethylene (HDPE) containers used for pesticide storage contained a mix of short and long-chain per- and polyfluorinated alkyl substances (PFAS), including PFOA, that leached into the product. The PFAS were not intentionally added to the HDPE but were produced when fluorine gas was applied to the plastic.

The process of polyethylene fluorination was approved by the Food and Drug Administration (FDA) in 1983 for food packaging to reduce oxygen and moisture migration through the plastic that would cause foods to spoil. The fluorination process forms a Teflon-like barrier on the plastic's surface. It is also used to strengthen the packaging, although this use was not included in the FDA approval.

Since EPA released its investigation, we have learned that the fluorination of plastic is commonly used to treat hundreds of millions of polyethylene and polypropylene containers each year ranging from packages consumers handle to larger containers used by retailers such as restaurants and to even larger drums used by manufacturers to store and transport fluids.

Fluorination of plastic and the inadvertent creation of PFAS may be another reason these 'forever chemicals' show up in many unexpected places and is another significant source that must be addressed. Much remains to be resolved as FDA and EPA actively investigate this new source of PFAS; however, preventive steps need to be taken quickly, especially since other PFAS-free barrier materials are available as alternatives.

Tom Neltner
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