Message

From: Leifer, Kerry [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=35839936F4A84DFEBC101D1E69F90BEF-KERRY B. LEIFER]
Sent: 3/25/2021 7:24:05 PM
To: Fertich, Elizabeth [fertich.elizabeth@epa.gov]
Subject: RE: [IVB1/CITAB Permanone 30:30] URGENT to Michal by 2pm - Balt. Sun inquiry
Attachments: RE: For review by Thur., 1/28: EPA comments on Draft Report Reconciling Terminology of the Universe of PFASs: Recommendations and Practical Guidance

Yes that CSF doesn't have any PFAS.

Ex. 5 Deliberative Process (DP)

The OPPT definition is a structural representation. It is included in the email string attachment.

Kerry Leifer, Chief
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
tel: (703) 308-8811
fax: (703) 605-0781

e-mail: leifer.kerry@epa.gov

From: Fertich, Elizabeth
Sent: Thursday, March 25, 2021 3:11 PM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>
Subject: RE: [IVB1/CITAB Permanone 30:30] URGENT to Michal by 2pm - Balt. Sun inquiry

Thanks. So for this CSF, would this be okay? Do you have to look at each impurity? Is there a list of PFAS chemicals somewhere I can check CSF against?

Ex. 4 CBI

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)
Product Manager 4
fertich.elizabeth@epa.gov
703-347-8560

From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Thursday, March 25, 2021 2:38 PM
To: Fertich, Elizabeth <fertich.elizabeth@epa.gov>
Subject: RE: [IVB1/CITAB Permanone 30:30] URGENT to Michal by 2pm - Balt. Sun inquiry

Ex. 5 Deliberative Process (DP)

Kerry Leifer, Chief
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From: Fertich, Elizabeth
Sent: Thursday, March 25, 2021 2:27 PM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>
Subject: RE: [IVB1/CITAB Permanone 30:30] URGENT to Michal by 2pm - Balt. Sun inquiry

So, I know for next time. When you looked at the actives were you looking at the impurities in the techs? Or were you making sure they were not MUPs that contained other inerts?

Elizabeth Fertich
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Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)
Product Manager 4
fertich.elizabeth@epa.gov
703-347-8560

From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Thursday, March 25, 2021 2:24 PM
To: Aubee, Catherine <Aubee.Catherine@epa.gov>; Fertich, Elizabeth <fertich.elizabeth@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Cc: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: RE: [IVB1/CITAB Permanone 30:30] URGENT to Michal by 2pm - Balt. Sun inquiry

I reviewed the CSF for Permanone 30:30 that Beth provided to me as well as the CSFs for the source active ingredient products (from OPPIN) and can confirm that there are no PFAS listed on those CSFs.

Kerry Leifer, Chief
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e-mail: leifer.kerry@epa.gov

From: Aubee, Catherine
Sent: Thursday, March 25, 2021 1:54 PM
To: Fertich, Elizabeth <fertich.elizabeth@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>
Cc: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: RE: [IVB1/CITAB Permanone 30:30] URGENT to Michal by 2pm - Balt. Sun inquiry

Kerry – thanks!

Best,
Catherine

From: Fertich, Elizabeth <fertich.elizabeth@epa.gov>
Sent: Thursday, March 25, 2021 1:53 PM
To: Aubee, Catherine <Aubee.Catherine@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>
Cc: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: RE: [IVB1/CITAB Permanone 30:30] URGENT to Michal by 2pm - Balt. Sun inquiry

I found the CSF. Can anyone assist with determining what qualifies as PFAS?

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)
Product Manager 4
fertich.elizabeth@epa.gov
703-347-8560

From: Aubee, Catherine <Aubee.Catherine@epa.gov>
Sent: Thursday, March 25, 2021 1:40 PM
To: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Fertich, Elizabeth <fertich.elizabeth@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>
Cc: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: [IVB1/CITAB Permanone 30:30] URGENT to Michal by 2pm - Balt. Sun inquiry
Importance: High

IVB1 Team and CITAB: Please see below. Can you please pull the materials/CSFs for this product and verify the statement below before 2PM? I realize this is a stretch – if we can't make the deadline, I recommend modifying the last two sentences to say we are following up with the registrant.

The registrant may be unaware of this new report that was just shared with EPA. I suggest giving them a call and then following up with an email chain to document their response for our internal recordkeeping.

Best,
Catherine

From: Ozmen, Shamus <Ozmen.Shamus@epa.gov>
Sent: Thursday, March 25, 2021 1:24 PM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Cc: Lara, Rhina <Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: URGENT to Michal by 2pm - Balt. Sun inquiry
Importance: High

Hi Marietta and Catherine,

Many apologies for this...Just an hour ago, we received an urgent deadline to get Michal a desk statement on PFAS and Permanone 30-30. Is there a way we can quickly **confirm that for Permanone 30-30,** Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

INCOMING:
My name is Christine Condon and I'm a reporter with the Baltimore Sun. I am writing about the research just released by Public Employees for Environmental Responsibility showing that P FAS were found in Permanone 30-30 in lab testing. I wanted to reach out to you all for comment.

I know that after PEER discovered PFAS in Anvil 10+10, EPA opted to conduct its own testing, and then called on states with stocks of mosquito product distributed in fluorinated HDPE containers to discontinue their use.

Is EPA likely to conduct its own testing on Permanone 30-30? If your findings mirror those of PEER, what steps could follow? Do you have any recommendations at this time for states or private groups that may be planning to use this pesticide this season?

My deadline for this is 3 p.m. this afternoon.

RESPONSE:
Aggressively addressing per- and polyfluoroalkyl substances (PFAS) continues to be an important, active and ongoing priority for the U.S. Environmental Protection Agency (EPA). EPA has been made aware of concerns that the insecticide Permanone 30-30 may contain traces of PFAS substances, and we take this issue very seriously. There are important unanswered questions but EPA is working hard to gather relevant information and to understand potential sources of PFAS in the pesticide product.

Currently all registered pesticides and those pending registration do not have chemical structures – or physical or chemical properties – comparable to PFAS such as PFOS, PFOA, GenX and PFBS. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Thursday, March 25, 2021 12:51 PM
To: Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: RE: Letter: Another widely used Pesticide contains PFAS - also Balt. Sun 3PM today

That would be an appropriate answer. Please confirm with the RD team.

_____

Ed Messina, Esq.
Acting Office Director
Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
p: (703) 347-0209

From: Ozmen, Shamus <Ozmen.Shamus@epa.gov>
Sent: Thursday, March 25, 2021 12:49 PM
To: Messina, Edward <Messina.Edward@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Lara, Rhina

<Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: RE: Letter: Another widely used Pesticide contains PFAS - also Balt. Sun 3PM today
Importance: High

HI Ed,

Thank you for the heads up on the CMS. We just received a press inquiry with a 3pm deadline about this (see below). Can we confirm that for Permanone 30-30, Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

INCOMING:
My name is Christine Condon and I'm a reporter with the Baltimore Sun. I am writing about the research just released by Public Employees for Environmental Responsibility showing that PFAS were found in Permanone 30-30 in lab testing. I wanted to reach out to you all for comment.

I know that after PEER discovered PFAS in Anvil 10+10, EPA opted to conduct its own testing, and then called on states with stocks of mosquito product distributed in fluorinated HDPE containers to discontinue their use.

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Ex. 5 Deliberative Process (DP)

From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Thursday, March 25, 2021 11:42 AM
To: Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Subject: FW: Letter: Another widely used Pesticide contains PFAS

For CMS

_____
Ed Messina, Esq.

Acting Office Director
Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
p: (703) 347-0209

From: Aubee, Catherine <Aubee.Catherine@epa.gov>
Sent: Thursday, March 25, 2021 11:32 AM
To: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>
Cc: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Subject: Fwd: Letter: Another widely used Pesticide contains PFAS

For awareness.

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

Begin forwarded message:

> **From:** Timothy Whitehouse <twhitehouse@peer.org>
> **Date:** March 25, 2021 at 11:27:18 AM EDT
> **To:** "Regan, Michael" <Regan.Michael@epa.gov>
> **Cc:** "Nesci, Kimberly" <Nesci.Kimberly@epa.gov>, "Aubee, Catherine" <Aubee.Catherine@epa.gov>, Ruth Berlin <mpnberlin@gmail.com>, Kyla Bennett <KBennett@peer.org>
> **Subject: Letter: Another widely used Pesticide contains PFAS**
>
> Dear Administrator Regan:
>
> Please find the attached letter from PEER and the Maryland Pesticide Education Network notifying you that we recently tested a pesticide widely used in Maryland for PFAS. The result showed the pesticide, Permanone 30-30, contains high levels of PFAS.
>
> We are also in the process of notifying the Maryland Department of Agriculture and Maryland Department of the Environment. See our attached letters.
>
> We would be happy to discuss this matter further with you. We have been working with Kimberly Nesci and Catherine Aube of your staff on the matter of PFAS in pesticides and have appreciated their attention to our concerns.
>
> Thank you for your attention to this matter and your continued work on these issues.
>
> Tim Whitehouse, JD, MA
> Executive Director
> Public Employees for Environmental Responsibility

202-265-7337 ext 109
Twitter: @TimWhitehouseUS