Message

From: Katims, Casey [Katims.Casey@epa.gov]
Sent: 2/25/2021 9:49:39 PM
To: Messina, Edward [Messina.Edward@epa.gov]
Subject: RE: PFAS in Pesticide Packaging

Thanks, Ed, that is helpful. Mostly want to make sure R4's input made it to you. Your comments make sense to me.

From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Thursday, February 25, 2021 3:45 PM
To: Katims, Casey <Katims.Casey@epa.gov>
Subject: RE: PFAS in Pesticide Packaging

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP). We are primarily focused on making sure that the fluorinated containers no longer contain PFAS or are discontinued. A lot of stakeholder outreach and industry stewardship activities are happening right now.

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: Katims, Casey <Katims.Casey@epa.gov>
Sent: Thursday, February 25, 2021 2:14 PM
To: Messina, Edward <Messina.Edward@epa.gov>
Subject: FW: PFAS in Pesticide Packaging
Importance: High

Ed - FYI

From: Blevins, John <Blevins.John@epa.gov>
Sent: Thursday, February 25, 2021 10:38 AM
To: Freedhoff, Michal <Freedhoff.Michal@epa.gov>
Cc: Katims, Casey <Katims.Casey@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; Jones, Aaryn <Jones.Aaryn@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: PFAS in Pesticide Packaging
Importance: High

Michal,

I hope all is well. I wanted to reach out and make sure that you were aware of some specific concerns from R4 states and *stakeholders* concerning EPA's January 14, 2021 press release on PFAS in Pesticide Packaging. As background, the Region held a listening session with our State stakeholder and shared our notes with your staff and others in HQ.

The Florida Department of Agriculture and Consumer Services (FDACS) submitted several questions to the EPA "Pesticide Packaging" mailbox. I know that your staff has been working on the issues identified and are swamped. It is my understanding that thus far the state has received one response. Immediately below is a summary of the initial questions (2/6/21), the EPA Pesticide Packaging mailbox response (2/23/21), and the subsequent questions asked by FDACS (2/23/21) below:

- What should be done with remaining stocks of Anvil 10+10? Can more information be provided on the registrant's response? (2/6/21)
    - Pesticides mailbox response on 2/23/21: *States with existing stock of Anvil 10+10 that is stored in HDPE containers should red tag that inventory and hold for now. Clarke Mosquito has informed EPA that it will reach out to all its customers regarding management of its Anvil 10+10 product.*
- Additional Qs from FL DACS on 2/23/21:
    - *In reference to the first question, our stakeholders would like more detail on the registrant's response. When can they expect the registrant to reach out? Will the product be picked up or returned to the company? Will the product be replaced?*
    - Other than Anvil 10+10, what other packaging/products are affected, including those that may go beyond agrichemical industry such as in the food industry or homeowner products? Can a list be provided?
    - 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?
    - Is the PFAS contamination confirmed to be linked to the fluorination process? If so, what are the alternatives to fluorination or alternative types of rigid containers available to the agrichemical industry?
    - 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 is the position 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 import/export of agricultural crops that were treated with agrichemicals stored in fluorinated HDPE packaging?

With growing season rapidly approaching FL, and our other States, our stakeholders would like to make informed pesticide purchases and/or may already have existing stocks of potentially impacted pesticides and are uncertain of the best path forward.

We appreciate your Office's work on this complex matter and will broadly share any updates with our Regional stakeholders.

Welcome aboard, and if you have any questions, give me a call.

John

John Blevins
Acting Region 4 Regional Administrator
US EPA Region 4
980 College Station Road
Athens GA 30605

214-437-9810 cell
706-355-8549 office
404-562-8231 (Atlanta Office number)

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