Message

From: Rickard, Kristin [Rickard.Kristin@epa.gov]
Sent: 8/29/2019 2:18:28 PM
To: Wilbur, Donald [Wilbur.Donald@epa.gov]
Subject: RE: Conazole cumulative language

Yes it was. Ok thanks!

~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Kristin Rickard
Acting Branch Chief, RAB4
Health Effects Division
Office of Pesticide Programs
Rickard.Kristin@epa.gov
703-347-0112

From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Thursday, August 29, 2019 10:16 AM
To: Rickard, Kristin <Rickard.Kristin@epa.gov>
Subject: RE: Conazole cumulative language

Ex. 5 Deliberative Process (DP)

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Donald Wilbur
Acting Deputy Director
U.S. Environmental Protection Agency
Office of Pesticide Programs
Health Effects Division (7509P)
1200 Pennsylvania Ave NW
Washington, DC 20460
Telephone: (703)-347-8894
Email: Wilbur.Donald@epa.gov
****

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From: Rickard, Kristin <Rickard.Kristin@epa.gov>
Sent: Thursday, August 29, 2019 9:49 AM
To: Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: Conazole cumulative language

Ex. 5 Deliberative Process (DP)
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Ex. 5 Deliberative Process (DP)

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Kristin Rickard
Acting Branch Chief, RAB4
Health Effects Division
Office of Pesticide Programs
Rickard.Kristin@epa.gov
703-347-0112

From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Thursday, August 29, 2019 8:52 AM
To: Perron, Monique <Perron.Monique@epa.gov>; Rickard, Kristin <Rickard.Kristin@epa.gov>
Subject: RE: Conazole cumulative language

Yep. I see KR already has that on the FR section on the RARC SharePoint. I am doing the imidazole version now. After we finish, we will need to send a note around to HED letting them know that we now have FR language available to use.

****

Donald Wilbur
Acting Deputy Director
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From: Perron, Monique <Perron.Monique@epa.gov>
Sent: Thursday, August 29, 2019 8:48 AM
To: Wilbur, Donald <Wilbur.Donald@epa.gov>; Rickard, Kristin <Rickard.Kristin@epa.gov>
Subject: RE: Conazole cumulative language

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[2] Guidance for Identifying Pesticide Chemicals and Other Substances that have a Common Mechanism of Toxicity (USEPA, 1999)
[3] Guidance on Cumulative Risk Assessment of Pesticide Chemicals That Have a Common Mechanism of Toxicity (USEPA, 2002)
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Ex. 5 Deliberative Process (DP)

From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Thursday, August 29, 2019 8:41 AM
To: Rickard, Kristin <Rickard.Kristin@epa.gov>
Cc: Perron, Monique <Perron.Monique@epa.gov>
Subject: RE: Conazole cumulative language

Ex. 5 Deliberative Process (DP)

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Donald Wilbur
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From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Wednesday, August 28, 2019 4:49 PM
To: Rickard, Kristin <Rickard.Kristin@epa.gov>
Cc: Perron, Monique <Perron.Monique@epa.gov>
Subject: Re: Conazole cumulative language

I am going to have to look at it more closely tomorrow AM. I am sad that I have to relive this on every conazole 😪

At least I get to share it with both of you though! 😁

Sent from my EPA iPhone

On Aug 28, 2019, at 4:37 PM, Rickard, Kristin <Rickard.Kristin@epa.gov> wrote:

> That makes sense – thanks Monique!
>
> Don – Ex. 5 Deliberative Process (DP)
>
> If so, I think I'm almost set with some FR language and I'll send it to both of you to peruse. 😊

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Kristin Rickard
Acting Branch Chief, RAB4
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Rickard.Kristin@epa.gov
703-347-0112

From: Perron, Monique <Perron.Monique@epa.gov>
Sent: Wednesday, August 28, 2019 4:27 PM
To: Rickard, Kristin <Rickard.Kristin@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: Conazole cumulative language

Hi Kristin,

Ex. 5 Deliberative Process (DP)

Don – am I remembering this correctly?

Thanks,
Monique

From: Rickard, Kristin <Rickard.Kristin@epa.gov>
Sent: Wednesday, August 28, 2019 4:23 PM
To: Perron, Monique <Perron.Monique@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: Conazole cumulative language

Thanks to you both!

Ex. 5 Deliberative Process (DP)

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Kristin Rickard
Acting Branch Chief, RAB4
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From: Perron, Monique <Perron.Monique@epa.gov>
Sent: Wednesday, August 28, 2019 4:14 PM
To: Wilbur, Donald <Wilbur.Donald@epa.gov>
Cc: Rickard, Kristin <Rickard.Kristin@epa.gov>
Subject: RE: Conazole cumulative language

We fixed this during mefentrifluconazole in early June so it might not have been reflected in the difenoconazole and propiconazole RAs. In an email to Angela on June 7th, you agreed to the following language that could be added.

Previously EPA has stated that there are no conclusive data that the conazoles share a common mechanism of toxicity; however, EPA is in the process of re-examining these data as part of Registration Review.

I believe the above language is for the FR notice since they don't allow footnotes. In the conazole cumulative standard language on the RARC site, a footnote has been added stating the following:

EPA's assessments of conazoles prior to the development of the 2016 Framework document noted the lack of conclusive data to make a common mechanism of toxicity finding for the conazoles.

From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Wednesday, August 28, 2019 4:03 PM
To: Perron, Monique <Perron.Monique@epa.gov>
Subject: Fwd: Conazole cumulative language

Didn't we fix his already?

Sent from my EPA iPhone

Begin forwarded message:

> **From:** "Rickard, Kristin" <Rickard.Kristin@epa.gov>
> **Date:** August 28, 2019 at 3:47:37 PM EDT
> **To:** "Wilbur, Donald" <Wilbur.Donald@epa.gov>
> **Subject: RE: Conazole cumulative language**
>
> Haha. You're going to wish you didn't ask. We are reviewing the difenoconazole FRN. RD was confused about which cumulative language to use, so I was doing some additional digging.
>
> Here is the cumulative language on the RARC SharePoint site (matches what is in our current difenoconazole RA and what is in the propiconazole RA):

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

This is what Angela inserted into the propiconazole FRN back in June 2019:
Unlike other pesticides for which EPA has followed a cumulative risk approach based on a common mechanism of toxicity, EPA has not made a common mechanism of toxicity finding as to propiconazole and any other substances; the Agency's previous statements regarding the potential for a common mechanism among the conazoles noted that the underlying data available at the time were inconclusive. Although the conazole fungicides (triazoles) produce 1,2,4 triazole and its acid-conjugated metabolites (triazolylalanine and triazolylacetic acid), 1,2,4 triazole and its acid-conjugated metabolites do not contribute to the toxicity of the parent conazole fungicides (triazoles). The Agency has assessed the aggregate risks from the 1,2,4 triazole and its acid-conjugated metabolites (triazolylalanine and triazolylacetic acid) separately. The supporting risk assessment concludes that aggregate risks are below the Agency's level of concern and can be found at http://www.regulations.gov in the document titled "Common Triazole Metabolites: Updated Aggregate Human Health Risk Assessment to Address New Section 3 Registrations For Use of Difenoconazole and Mefentrifluconazole." in docket ID number EPA-HQ-OPP-2018-0002. Propiconazole does not appear to produce any other toxic metabolite produced by other substances. For the purposes of this action, therefore, EPA has not assumed that propiconazole has a common mechanism of toxicity with other substances. For information regarding EPA's efforts to determine which chemicals have a common mechanism of toxicity and to evaluate the cumulative effects of such chemicals, see EPA's website at http://www2.epa.gov/pesticide-science-and-assessing-pesticide-risks/cumulative-assessment-risk-pesticides.

Maybe Thurston and I just missed the discrepancy in the propiconazole FRN. I just wanted to make sure we are being consistent in all of the documents…

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Kristin Rickard
Acting Branch Chief, RAB4
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Office of Pesticide Programs
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Rickard.Kristin@epa.gov
703-347-0112

-----Original Message-----
From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Wednesday, August 28, 2019 3:41 PM
To: Rickard, Kristin <Rickard.Kristin@epa.gov>
Subject: Conazole cumulative language

What is the issue? Now I am curious

Sent from my EPA iPhone