

Message

From: Holm, Stewart [Stewart_Holm@afandpa.org]
Sent: 3/14/2018 1:06:52 AM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: CDR Meeting

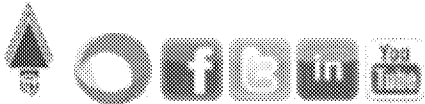
Hi Nancy,

Very nice to see you yesterday. We look forward to meeting with you on CDR reporting of pulp mill liquors. I can possibly meet with my team next week on March 22. However, several people on my team will be coming from out of town so this date may be too soon. The best date is April 5, preferably around a 1:00 time frame. I'll be in touch in the next few days but wanted to move quickly on this.

Thank you.

Stewart

STEWART E. HOLM
Chief Scientist
stewart_holm@afandpa.org
(202) 463-2709
AMERICAN FOREST & PAPER ASSOCIATION
1101 K Street, N.W., Suite 700
Washington, D.C. 20005



Message

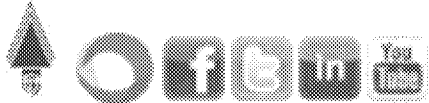
From: Holm, Stewart [Stewart_Holm@afandpa.org]
Sent: 3/16/2018 7:24:48 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
CC: Bolen, Derrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1ffc58b0468c4deca51a8bad735b7d95-Bolen, Derr]
Subject: RE: CDR Meeting

Hi Derrick,
Is it looking like this may work or should we look at other dates?

Thank you.

Stewart

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From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Tuesday, March 13, 2018 11:37 PM
To: Holm, Stewart <Stewart_Holm@afandpa.org>
Cc: Bolen, Derrick <bolen.derrick@epa.gov>
Subject: RE: CDR Meeting

Hey Stewart,
It was a pleasant surprise to see you! I'm looping in Derrick who can assist with the schedule and finding a window on the 5th.
Have a great vacation—dive safe and take pictures!!

Nancy

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP
P: 202-564-1273
M: 202-731-9910
beck.nancy@epa.gov

From: Holm, Stewart [mailto:Stewart_Holm@afandpa.org]

Sent: Tuesday, March 13, 2018 9:07 PM

To: Beck, Nancy <Beck.Nancy@epa.gov>

Subject: CDR Meeting

Hi Nancy,

Very nice to see you yesterday. We look forward to meeting with you on CDR reporting of pulp mill liquors. I can possibly meet with my team next week on March 22. However, several people on my team will be coming from out of town so this date may be too soon. The best date is April 5, preferably around a 1:00 time frame. I'll be in touch in the next few days but wanted to move quickly on this.

Thank you.

Stewart

STEWART E. HOLM

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Message

From: BRADLEY Kevin [kbradley@bsef.org]
Sent: 2/12/2018 2:31:35 PM
To: Michael Dourson [dourson.michael@gmail.com]; sminick@txbiz.org; sferenc@cpda.com; raj.sharma@gapac.com; patakis@comcast.net; jarchbo@toronto.ca; Henry Roman [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userc094bf11]; dmccarty@dnr.state.ga.us; chenai@ucmail.uc.edu; aoller@nipera.org; ansellj@personalcarecouncil.org; anikiforov@toxregserv.com; abegaze@ajiusa.com; SBennett@cspa.org; abraham.tobia@fda.hhs.gov; Eileen.Abt@fda.hhs.gov; abennett@aeiconsultants.com; Jennifer.Adams@kochps.com; Admon Smadar - ICL - Industrial Products [smadar.admon@icl-group.com]; adrien.bouzonville@gmail.com; anhilary@yahoo.com; Ahmet.Bulbulkaya@tn.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=63b3113c98484e2ebb74a5c176a293c8-Ahmet.Bulbulkaya@tn.gov]; Akerman, Gregory [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cf6a8e38174a4518bae8feeeab9c6b2a-Gregory Akerman]; agshydro@aol.com; ali.furmall@state.nm.us; ALEEHAMADEH@GMAIL.COM; Acooke@kellencompany.com; aowen@dragun.com; amy.wehnert@amec.com; MANDERSO@idem.IN.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d04c9a3390e84b388061b52bac80d75b-MANDERSO@idem.IN.gov]; Steve.Anderson@albemarle.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c4a53d57796847fdab73919a74085611-Steve.Ander]; agthiros@uss.com; aumyn@walshenv.com; angela.li-muller@hc-sc.gc.ca; Anita.K.Meyer@usace.army.mil [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebb41195f2324548959139e28c25b8a6-Anita.K.Meyer@usace.army.mil]; abradley@integral-corp.com; Davis Ann - Dow [aedavis@dow.com]; de Peyster Ann - San Diego State University [adepeyst@mail.sdsu.edu]; Anne LeHuray [alehuray@naphthalene.org]; dietz.annette@deq.state.or.us; And6@cdc.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=587490e6db3a4cfb871d476004b656b3-And6@cdc.gov]; flood@ific.org; Asheesh.Tiwary@chevron.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0491e9d4bd494d41a041d234183bcb9b-Asheesh.Tiwary@chevron.com]; aprescott@tectest.com; adstuerke@terracon.com; ashley.winkelman@cardno.com; nlove@cgs.us.com; Asish Mohapatra [asish.mohapatra@hc-sc.gc.ca]; audrey.rush@epa.state.oh.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c29591a6ea014d0d8bf7635de487611c-audrey.rush@epa.state.oh.us]; a.boobis@imperial.ac.uk; joseph.brune.2.ctr@us.af.mil; Ryan_Baldwin@americanchemistry.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bd3b0a608e0d4d9ba5fada9a01e2f218-Ryan_Baldwin@americanchemistry.com]; bbeck@gradientcorp.com; MBasu@gmaonline.org [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2a899af4afae4803b245561c4363fd25-MBasu@gmaonline.org]; Audrey.Batoon@Chemtura.com; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Rick_Becker@americanchemistry.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f03aaee7f1014aad916f86c53f886717-Rick_Becker@americanchemistry.com]; Clark, Becki [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a906e07f1cd143b9a3c2ddab813b8140-Clark, Becki]; bclement@burnsmcd.com; ben.stanphill@arcadis-us.com; Diane.Benford@foodstandards.gsi.gov.uk; benjamin.davies@icmm.com; benny.deghgi@honeywell.com; Benson, Bob [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ccd3c8d2700447d2a9cc695b9a73340a-Benson, Bob]; bertrand.langlet@hc-sc.gc.ca; bmeek@uottawa.ca; bhat@nsf.org [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8ecfc126e10f480d9c4f028e0cc3ea5e-bhat@nsf.org]; Sundar, Bhooma [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a2f788f7db4497b8c48309043cdc005-BSundar]; bill.goulet@axiall.com; Gullede Bill - American Chemistry Council (The) [bill_gullede@americanchemistry.com]; birnbaum@niehs.nih.gov; matthew.blais@swri.org; blayne@hartmaneg.com; Benson, Bob [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ccd3c8d2700447d2a9cc695b9a73340a-Benson, Bob]; campb53@yahoo.com; rthielke@trininc.com; kim_boekelheide@brown.edu; bonnie.brooks@state.mn.us; booker@niehs.nih.gov; bcs@barr.com; brad.weaver@celanese.com; bgentry@iwmconsult.com; seidman.brenda@epa.gov; bchapman@gfnet.com; Brent_Kobielush@cargill.com; roger.brewer@doh.hawaii.gov [/o=ExchangeLabs/ou=Exchange Administrative Group

(FYDIBOHF23SPDLT)/cn=Recipients/cn=0751cf70ccd24e67923cf60b935cdb5-roger.brewer@doh.hawaii.gov]; bcochran@aeiconsultants.com; HOWARD, WILLIAM B GS-13 USAF AFMC AFCEC/CZTE [william.howard.40@us.af.mil]; obrien.bridget@epa.gov; mcatee@ppg.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7aa1bdbcd318460e83c1c6b18a6aff7d-mcatee@ppg.com]; aaron.brogdon@squirepb.com; bruce.c.allen@outlook.com; bryan.leece@stantec.com; burleighflayer@ppg.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4176125deb042129502188461413347-burleighflayer@ppg.com]; Shelley.Burman@state.mn.us; Burr Alexa - American Chemistry Council (The) [Alexa_Burr@americanchemistry.com]

Subject: RE: Rejoining TERA

Welcome back Mike,

Best wishes,

Kevin

Dr Kevin Bradley
Secretary General



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EU Transparency Register No: 4641 9392 1314-91

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From: Michael Dourson [mailto:dourson.michael@gmail.com]

Sent: Monday, 12 February 2018 15:09

To: sminick@txbiz.org; sferenc@cpda.com; raj.sharma@gapac.com; patackis@comcast.net; jarchbo@toronto.ca; hroman@indecon.com; dmccarty@dnr.state.ga.us; chenai@ucmail.uc.edu; aoller@nipera.org; ansellj@personalcarecouncil.org; anikiforov@toxregserv.com; abegaze@ajiusa.com; SBennett@cspa.org; abraham.tobia@fda.hhs.gov; Eileen.Abt@fda.hhs.gov; abennett@aeiconsultants.com; Jennifer.Adams@kochps.com; Admon Smadar - ICL - Industrial Products <smadar.admon@icl-group.com>; adrien.bouzonville@gmail.com; anhilary@yahoo.com; ahmet.bulbulkaya@tn.gov; Akerman.Gregory@epa.gov; agshydro@aol.com; ali.furmall@state.nm.us; ALEEAMADEH@GMAIL.COM; Acooke@kellencompany.com; aowen@dragun.com; amy.wehnert@amec.com; MANDERSO@idem.IN.gov; steve.anderson@albemarle.com; agthiros@uss.com; aumyn@walshenv.com; angela.li-muller@hc-sc.gc.ca; Anita.K.Meyer@usace.army.mil; abradley@integral-corp.com; Davis Ann - Dow <aedavis@dow.com>; de Peyster Ann - San Diego State University <adepeyst@mail.sdsu.edu>; Anne LeHuray <alehuray@naphthalene.org>; dietz.annette@deq.state.or.us; and6@cdc.gov; flood@ific.org; asheesh.tiary@chevron.com; aprescott@tectest.com; adstuerke@terracon.com; ashley.winkelman@cardno.com; nlove@cgs.us.com; Asish Mohapatra <asish.mohapatra@hc-sc.gc.ca>; audrey.rush@epa.state.oh.us; a.boobis@imperial.ac.uk; joseph.brune.2.ctr@us.af.mil; Baldwin Ryan - American Chemistry Council (The) <ryan_baldwin@americanchemistry.com>; bbeck@gradientcorp.com; MBasu@gmaonline.org; Audrey.Batoon@Chemtura.com; Beck, Nancy <Beck.Nancy@epa.gov>; Rick_Becker@americanchemistry.com; clark.becki@epa.gov; bclement@burnsmcd.com; ben.stanphill@arcadis-us.com; Diane.Benford@foodstandards.gsi.gov.uk; benjamin.davies@icmm.com; benny.dehghi@honeywell.com; Benson.Bob@epa.gov; bertrand.langlet@hc-sc.gc.ca; bmeek@uottawa.ca; bhat@nsf.org; sundar.bhooma@epa.gov; bill.goulet@axiall.com; Gulledege Bill - American Chemistry Council (The) <bill_gulledege@americanchemistry.com>; birnbaum@niehs.nih.gov; matthew.blais@swri.org; blayne@hartmaneg.com; benson.bob@epa.gov;

campb53@yahoo.com; rthielke@trininc.com; kim_boekelheide@brown.edu; bonnie.brooks@state.mn.us; booker@niehs.nih.gov; bcs@barr.com; brad.weaver@celanese.com; bgentry@iwmconsult.com; BRADLEY Kevin <kbradley@bsef.org>; seidman.brenda@epa.gov; bchapman@gfnet.com; Brent_Kobielush@cargill.com; roger.brewer@doh.hawaii.gov; bcochran@aeiconsultants.com; HOWARD, WILLIAM B GS-13 USAF AFMC AFCEC/CZTE <william.howard.40@us.af.mil>; obrien.bridget@epa.gov; mcatee@ppg.com; aaron.brogdon@squirepb.com; bruce.c.allen@outlook.com; bryan.leece@stantec.com; Burleigh-Flayer Heather - PPG Industries Inc. <burleighflayer@ppg.com>; Shelley.Burman@state.mn.us; Burr Alexa - American Chemistry Council (The) <Alexa_Burr@americanchemistry.com>

Subject: Rejoining TERA

Dear Colleagues

I am pleased to announce my return to the nonprofit 501c3 organization, *Toxicology Excellence for Risk Assessment* (TERA), as its Director of Science. As many of you know, TERA joined the University of Cincinnati, College of Medicine (<https://med.uc.edu/eh/centers/rsc>) two years ago and became known as the Risk Science Center (RSC). However, TERA always maintained an external nonprofit organization under the leadership of Dr. Patricia McGinnis in order to complete several contracts, including one with the Consumer Products Safety Commission.

TERA's Board of Trustees has decided to continue TERA as a nonprofit organization and remain a separate entity from the RSC. TERA's mission will emphasize hazard identification, dose response assessment, independent peer review, and public education. Dr. McGinnis will continue to serve as TERA's President leading the business and contributing to projects as a board-certified toxicologist.

As many of you also know, TERA's extensive collaborative work was woefully mischaracterized during my US EPA confirmation hearings. Responses to this mischaracterization can be viewed at <http://tera.org/TERAcollaborativework%2012.8.17.pdf>. You may also wish to view <https://www.cincinnati.com/story/news/politics/2018/01/25/university-cincinnati-professor-former-uc-professor-dourson-picks-up-pieces-after-failed-controversi/1047685001/> for some additional thoughts on this confirmation process.

TERA looks forward to the opportunity to work with you in the future. If you are attending the annual meeting of the Society of Toxicology next month, please stop by our booth #555.

Cheers!

Michael...

...L. Dourson, Ph.D., DABT, FATS, FSRA
Director of Science
Toxicology Excellence for Risk Assessment
1250 Ohio Pike, Suite #197
Amelia, Ohio 45102-1239

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419-892-2502 (Mondays)

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Message

From: Ali Hamade [aleehamadeh@gmail.com]
Sent: 2/12/2018 2:13:39 PM
To: Michael Dourson [dourson.michael@gmail.com]
CC: sminick@txbiz.org; sferenc@cpda.com; raj.sharma@gapac.com; patackis@comcast.net; jarchbo@toronto.ca; Henry Roman [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userc094bf11]; dmccarty@dnr.state.ga.us; chenai@ucmail.uc.edu; aoller@nipera.org; ansellj@personalcarecouncil.org; anikiforov@toxregserv.com; abegaze@ajiusa.com; SBennett@cspa.org; abraham.tobia@fda.hhs.gov; Eileen.Abt@fda.hhs.gov; abennett@aeiconsultants.com; Jennifer.Adams@kochps.com; smadar.admon@icl-group.com; adrien.bouzonville@gmail.com; anhilary@yahoo.com; Ahmet.Bulbulkaya@tn.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=63b3113c98484e2ebb74a5c176a293c8-Ahmet.Bulbulkaya@tn.gov]; Akerman, Gregory [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cf6a8e38174a4518bae8feeeab9c6b2a-Gregory Akerman]; agshydro@aol.com; ali.furmall@state.nm.us; Acooke@kellencompany.com; aowen@dragun.com; amy.wehnert@amec.com; MANDERSO@idem.IN.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d04c9a3390e84b388061b52bac80d75b-MANDERSO@idem.IN.gov]; Steve.Anderson@albemarle.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c4a53d57796847fdab73919a74085611-Steve.Ander]; agthiros@uss.com; aumyn@walshenv.com; angela.li-muller@hc-sc.gc.ca; Anita.K.Meyer@usace.army.mil [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebb41195f2324548959139e28c25b8a6-Anita.K.Meyer@usace.army.mil]; abradley@integral-corp.com; aedavis@dow.com; adepeyst@mail.sdsu.edu; Anne LeHuray [alehuray@naphthalene.org]; dietz.annette@deq.state.or.us; And6@cdc.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=587490e6db3a4cfb871d476004b656b3-And6@cdc.gov]; flood@ific.org; Asheesh.Tiwary@chevron.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0491e9d4bd494d41a041d234183bcb9b-Asheesh.Tiwary@chevron.com]; aprescott@tectest.com; adstuerke@terracon.com; ashley.winkelman@cardno.com; nlove@cgs.us.com; Asish Mohapatra [asish.mohapatra@hc-sc.gc.ca]; audrey.rush@epa.state.oh.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c29591a6ea014d0d8bf7635de487611c-audrey.rush@epa.state.oh.us]; a.boobis@imperial.ac.uk; joseph.brune.2.ctr@us.af.mil; Ryan_Baldwin@americanchemistry.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bd3b0a608e0d4d9ba5fada9a01e2f218-Ryan_Baldwin@americanchemistry.com]; bbeck@gradientcorp.com; MBasu@gmaonline.org [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2a899af4afae4803b245561c4363fd25-MBasu@gmaon]; Audrey.Batoon@chemtura.com; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Rick_Becker@americanchemistry.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f03aaee7f1014aad916f86c53f886717-Rick_Becker@americanchemistry.com]; Clark, Becki [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a906e07f1cd143b9a3c2ddab813b8140-Clark, Becki]; bclement@burnsmcd.com; ben.stanphill@arcadis-us.com; Diane.Benford@foodstandards.gsi.gov.uk; benjamin.davies@icmm.com; benny.dehghi@honeywell.com; Benson, Bob [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ccd3c8d2700447d2a9cc695b9a73340a-Benson, Bob]; bertrand.langlet@hc-sc.gc.ca; bmeek@uottawa.ca; bhat@nsf.org [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8ecfc126e10f480d9c4f028e0cc3ea5e-bhat@nsf.org]; Sundar, Bhooma [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a2f788f7db4497b8c48309043cdc005-BSundar]; bill.goulet@axiall.com; Bill_Gulledge@americanchemistry.com; birnbaumsl@niehs.nih.gov; matthew.blais@swri.org; blayne@hartmaneg.com; campb53@yahoo.com; rthielke@trininc.com; kim_boekelheide@brown.edu; bonnie.brooks@state.mn.us; booker@niehs.nih.gov; bcs@barr.com; brad.weaver@celanese.com; bgentry@iwmconsult.com; kbradley@bsef.org; seidman.brenda@epa.gov; bchapman@gfnet.com; Brent_Kobielush@cargill.com; roger.brewer@doh.hawaii.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0751cf70ccd24e67923cf60b935cdbc5-roger.brewer@doh.hawaii.gov]; bcochran@aeiconsultants.com; HOWARD, WILLIAM B GS-13 USAF AFMC AFCEC/CZTE

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Subject: Re: Rejoining TERA

Good luck!

On Feb 12, 2018 09:08, "Michael Dourson" <dourson.michael@gmail.com> wrote:

Dear Colleagues

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Cheers!

Michael...

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Message

From: Michael Dourson [dourson.michael@gmail.com]
Sent: 2/12/2018 2:08:47 PM
To: sminick@txbiz.org; sferenc@cpda.com; raj.sharma@gapac.com; patakis@comcast.net; jarchbo@toronto.ca; Henry Roman [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userc094bf11]; dmccarty@dnr.state.ga.us; chenai@ucmail.uc.edu; aoller@nipera.org; ansellj@personalcarecouncil.org; anikiforov@toxregserv.com; abegaze@ajiusa.com; SBennett@cspa.org; abraham.tobia@fda.hhs.gov; Eileen.Abt@fda.hhs.gov; abennett@aeiconsultants.com; Jennifer.Adams@kochps.com; smadar.admon@icl-group.com; adrien.bouzonville@gmail.com; anhilary@yahoo.com; Ahmet.Bulbulkaya@tn.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=63b3113c98484e2ebb74a5c176a293c8-Ahmet.Bulbulkaya@tn.gov]; Akerman, Gregory [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cf6a8e38174a4518bae8feeeab9c6b2a-Gregory Akerman]; agshydro@aol.com; ali.furmall@state.nm.us; ALEEHAMADEH@GMAIL.COM; Acooke@kellencompany.com; aowen@dragun.com; amy.wehnert@amec.com; MANDERSO@idem.IN.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d04c9a3390e84b388061b52bac80d75b-MANDERSO@idem.IN.gov]; Steve.Anderson@albemarle.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c4a53d57796847fdab73919a74085611-Steve.Ander]; agthiros@uss.com; aumyn@walshenv.com; angela.li-muller@hc-sc.gc.ca; Anita.K.Meyer@usace.army.mil [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebb41195f2324548959139e28c25b8a6-Anita.K.Meyer@usace.army.mil]; abradley@integral-corp.com; aedavis@dow.com; adepeyst@mail.sdsu.edu; Anne LeHuray [alehuray@naphthalene.org]; dietz.annette@deq.state.or.us; And6@cdc.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=587490e6db3a4cfb871d476004b656b3-And6@cdc.gov]; flood@ific.org; Asheesh.Tiwary@chevron.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0491e9d4bd494d41a041d234183bcb9b-Asheesh.Tiwary@chevron.com]; aprescott@tectest.com; adstuerke@terracon.com; ashley.winkelman@cardno.com; nlove@cgs.us.com; Asish Mohapatra [asish.mohapatra@hc-sc.gc.ca]; audrey.rush@epa.state.oh.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c29591a6ea014d0d8bf7635de487611c-audrey.rush@epa.state.oh.us]; a.boobis@imperial.ac.uk; joseph.brune.2.ctr@us.af.mil; Ryan_Baldwin@americanchemistry.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bd3b0a608e0d4d9ba5fada9a01e2f218-Ryan_Baldwin@americanchemistry.com]; bbeck@gradientcorp.com; MBasu@gmaonline.org [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2a899af4afae4803b245561c4363fd25-MBasu@gmaon]; Audrey.Batoon@Chemtura.com; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Rick_Becker@americanchemistry.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f03aaee7f1014aad916f86c53f886717-Rick_Becker@americanchemistry.com]; Clark, Becki [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a906e07f1cd143b9a3c2ddab813b8140-Clark, Becki]; bclement@burnsmcd.com; ben.stanphill@arcadis-us.com; Diane.Benford@foodstandards.gsi.gov.uk; benjamin.davies@icmm.com; benny.dehghi@honeywell.com; Benson, Bob [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ccd3c8d2700447d2a9cc695b9a73340a-Benson, Bob]; bertrand.langlet@hc-sc.gc.ca; bmeek@uottawa.ca; bhat@nsf.org [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8ecfc126e10f480d9c4f028e0cc3ea5e-bhat@nsf.org]; Sundar, Bhooma [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a2f788f7db4497b8c48309043cdc005-BSundar]; bill.goulet@axiall.com; Bill_Gulledge@americanchemistry.com; birnbaumsl@niehs.nih.gov; matthew.blais@swri.org; blayne@hartmaneg.com; Benson, Bob [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ccd3c8d2700447d2a9cc695b9a73340a-Benson, Bob]; campb53@yahoo.com; rthielke@trininc.com; kim_boekelheide@brown.edu; bonnie.brooks@state.mn.us; booker@niehs.nih.gov; bcs@barr.com; brad.weaver@celanese.com; bgentry@iwmconsult.com; kbradley@bsef.org; seidman.brenda@epa.gov; bchapman@gfnet.com; Brent_Kobielush@cargill.com; roger.brewer@doh.hawaii.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0751cf70ccd24e67923cf60b935cdbc5-roger.brewer@doh.hawaii.gov];

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Subject: Rejoining TERA

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Message

From: Pane, Vickie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4EF94CDE4E864]
Sent: 2/8/2018 11:05:05 PM
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(FYDIBOHF23SPDLT)/cn=Recipients/cn=50fdeafd7ff74bd7bb8ad26893ac4760-Winters, Melissa]; Wire, Cindy [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=cf7be035da4b45a3a7d45c84c9f4b4a3-LWise]; Wood, Melaniel [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=5c663a89f6284984b150d0f1e98def60-Lance Wormell]; Aguilar, Marcus [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=725e02f59a594613b4c8a8fa6035b6fe-Kander02]; Arrazola, Ignacio [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Bertrand, Charlotte [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=1e8db468531a44949eec31f94db4f002-Bookman, Robert]; Callier, James [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=7c74a8bf45594342ac8ca1bb69e2bb48-Dcampb03]; Chiang, Johnny [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=225f7ff32b1e40ada14fd86beee6d4b0-Chow, James]; Daly, Carl [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=b9f207a623824720907845ead85383ca-Dwyer, Stacey]; Espinosa, Monica [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=572986d047624669891da90708433da1-Brian Frazer]; Freeman, Caroline [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=1124df96ce2c40bab3557b5857bcc87d-Gahner, Pam]; Goetz, Mary [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=7eeb1ab7c7a74b40bf9bfded67e7fafd-Mark A Hartman]; Hayes, Sharon [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=07f9bbcf7c7c4219aa78a9618f7ead54-John D. Hebert]; Heller, Zoe (Separated 6/2/17) [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=58eb09e9b9824e2da11ecf63286a16a3-Hestmark, Martin]; Hofmann, Angela [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=a2dc7d29d6bd4784b58ca9100916d02c-Timothy Hutchens]; Keaney, Kevin [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=da8c8861510148a6bdcd084192758505-Lowery, Brigid]; MaGee, Julie [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=748778d158164c729ef4c4d64c0a36cc-McLeod, Jul]; Miles, James [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=8267862f7fea4782aec32ea5fec8c19c-wymiller]; Moore, Audrey [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=e5750271b58f406194fcd52b35d21463-CMoore03]; Pratt, Stacie [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=46bc9279863142288be2f5d8cd951722-MPrice]; Priselac, Adrienne [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=68056c0c1ab949d18d8b041158d020c6-Rea, Kristi]; Richardson, Vickie [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=90ddf616ccc9433aa31f87095d24c374-Saenz, Diana]; Shimkin, Martha [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=7b5d348284ab43d7921f3a4a7469efb3-STIGLER, TERRANCE]; Sturdivant, Donnette [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=ab9339d98405486fb7109fe4ab65b7be-Symmes, Brian]; Tillman, Thomas [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=47910af0d20e434d9761bd5e8f6783ea-Vizard, Elizabeth]; weiss, donna [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=93278d5ec0f0468dac30d74cfaddc9f9-Williams, S]; Williamson, Anahita [/o=ExchangeLabs/ou=ExchangeLabs/](FYDIBOHF23SPDLT)/cn=Recipients/cn=f2830ba05b6e4f6aaa8270df5085a137-Wilson, Daphne]

Subject Sincere Apologies for This Afternoon's Disaster

:

Good afternoon all-

I hope you all are having a better day than I am!

So, that might be a first – technical difficulties on all parts: VTC, SKYPE and the new Office 365 Dial-in Conferencing.

Please accept my sincere apologies. All of the problems have been reported and are being investigated. Blame is settling in on Office 365.

The meeting will be rescheduled – hopefully for some time next week, but we may have to limit participation to one technical forum (TBD) for the near future – stay tuned.

After many of you had left the meeting, there were some agenda suggestions mentioned including:

Have someone discuss OECA Mission Measures

Discuss the Administrator's War on Lead message

Provide an update on the WPS Options Selection

Update on where we are with the Lead Dust Rule

Compare notes/success with RCRA program concerning briefs to new administrators on the importance of programs

Revisiting the underfunded programs/realigning resources, etc.

I may not have caught everything. Some of these may be suggestions for the In-Person meeting.

If you made one of these suggestions, please clarify. Other suggestions welcome too.

Thank you for your patience. I hope you all have a wonderful evening!

Vickie Pane

Lead Region Coordinator, OCSPP

US EPA Region 2

2890 Woodbridge Ave. (MS 225)

Edison, NJ 08837-3679

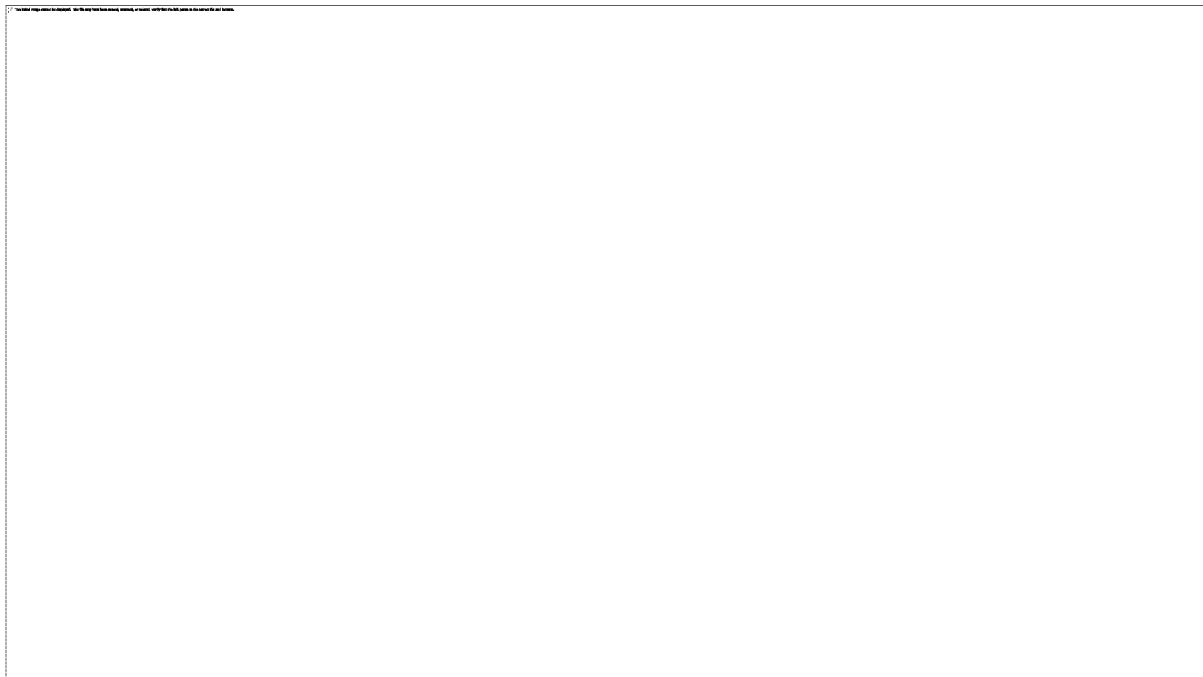
732-321-6667

[OCSPP Lead Region Community SharePoint Site](#)

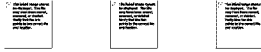
Message

From: AF&PA Communications [comm@afandpa.org]
Sent: 7/24/2018 2:00:51 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group
(FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: Available Now: 2018 AF&PA Sustainability Report

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Message

From: Norman, Caffey [caffey.norman@squirepb.com]
Sent: 3/5/2018 8:44:06 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: Presentation at SPB General Counsel Roundtable
Attachments: 2018 Roundtable for General Counsel in the Chemical and Performance Materials Industry; USA Roundtable Attendance through 2017.pdf

Dear Nancy,

Thank you for considering participation in a panel discussion at the SPB General Counsel Roundtable April 5-6 here in Washington. Attached is a save-the-date which will be supplemented with materials tailored to you and David Banks, along with a list of attendees in previous years so you can have a sense of the audience.

Please let me know if your schedule will accommodate (late morning on the 6th is preferred but not critical time)

Best regards,



W. Caffey Norman
Partner
Squire Patton Boggs (US) LLP
2550 M Street, NW
Washington, DC 20037
T +1 202 457 5270
F +1 202 457 6315
M +1 202 460 9495

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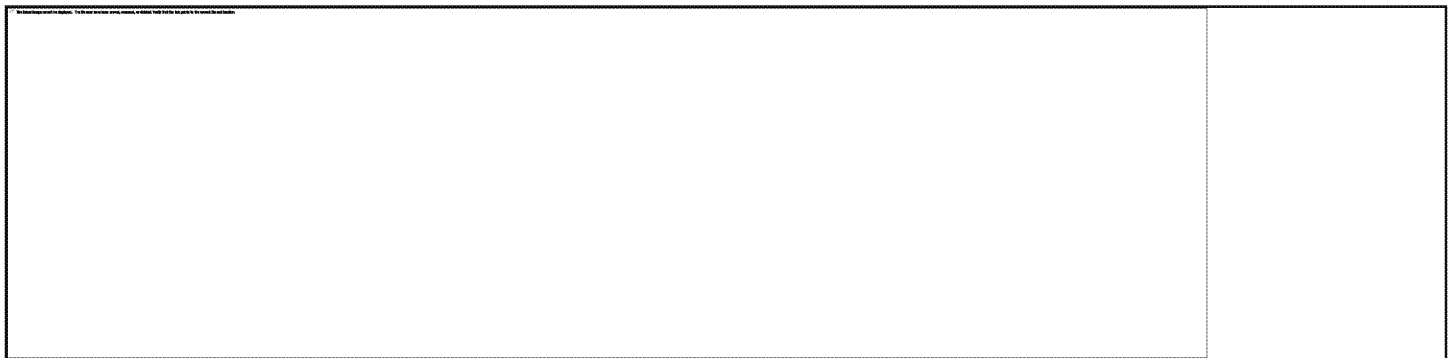
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Message

From: Buller, Carolyn J. [carolyn.buller@squirepb.com]
Sent: 11/28/2017 2:57:26 PM
To: Bernstein, Carol [carol_bernstein@cabotcmp.com]; Berube, Brian A. [brian_berube@cabot-corp.com]; Blanchard, Eric [eablanchard@olin.com]; Bost II, Glenn E. [gbost@ppg.com]; Brown, Pauletta J. [pauletta.brown@lucite.com]; Chemnitz, Gregory R. [Gregory.Chemnitz@materion.com]; Claiborne, Hobie [hobie.claiborne@carpenter.com]; Day, Suzanne F. [suzanne.day@lubrizol.com]; Duesenberg, Mark H. [mark.duesenberg@ferro.com]; Ederington, Ben [bederington@westlake.com]; Edison, Sheri [shedison@bemis.com]; Ellis, Scott [sellis@tatachemicals.com]; Feeney, Kevin [kevin.feeney@airliquide.com]; Feuss, Linda U. [linda.feuss@bayer.com]; Ganz, Peter J. [pganz@ashland.com]; Garceau, Mary [mary.garceau@sherwin.com]; Golden, David A. [dgolden@eastman.com]; Gupta, Ravila [ravila.gupta@am.umicore.com]; Harrelson, Kimberly [kim.harrelson@lonza.com]; Hernandez, Francisco [francisco.hernandez@mexichem.com]; Hill, Timothy J. [hillt@cpchem.com]; Horton, Andrean [andrea.horton@us.aschulman.com]; Isaacson, Mark [mark.isaacson@mosaicco.com]; Johns, Douglas [douglas.johns@hexion.com]; Johnson, Celia [cjohnson@graymont.com]; Kaplan, Jeffrey A. [jeffrey.kaplan@lyb.com]; Keenan, Timothy J. [tim.keenan@hbfuller.com]; Kunkle, Lisa K. [lisa.kunkle@polyone.com]; Lattimore, Rachel G. [rlattimore@croplifeamerica.org]; LeMay, James C. [jim.lemay@omnova.com]; Lepore, Matthew [matt.lepore@basf.com]; Major, Sean [majors@airproducts.com]; Masterson, Thomas [thomas.masterson@siigroup.com]; Matthews, Elizabeth [elizabeth.matthews@total.com]; McCaskill, Randy A. [ramccaskill@tkinet.com]; McGrath, Marlene M. [mmmcmgrath@mmm.com]; Mitchell, William C. [bill.mitchell@novachem.com]; Moran, John D. [john.moran@momentive.com]; Muglia, Richard [richard.muglia@tronox.com]; Mulligan, Gregory J. [gregory.mulligan@evonik.com]; Narwold, Karen G. [karen_narwold@albemarle.com]; Nightingale, Alice [anightingale@fpcusa.com]; Nivica Jr., Gjon N. [gjon.nivica.jr@celanese.com]; Podwika, Joseph A. [japodwika@potashcorp.com]; Powell, Gary E. [gary.powell@emeryoleo.com]; Price, Kevin [kprice@methanex.com]; Rachford, Laurie A. [laurie.a.rachford@exxonmobil.com]; Radcliffe, Susan [susan.radcliffe@kemira.com]; Rzepecki, David S. [david.rzepecki@covestro.com]; Saunders, Charles T. [charles.saunders@ineos.com]; Saviano, Anthony T. [anthony.saviano@solvay.com]; Seifert, James [jim.seifert@ecolab.com]; Shastri, Naveena [naveena.shastri@sabic.com]; Shelton, David C. [david.c.shelton@chemours.com]; Simmons, Jay [Jay.Simmons@Kraton.com]; Snively, David F. [david.f.snively@monsanto.com]; Stolle, Russ [russ.stolle@huntsman.com]; Stryker, David M. [david_stryker@huntsman.com]; Sussman, Jason [jason.sussman@lubrizol.com]; Traub, Robert T. [traubr@quakerchem.com]; Tuckett III, Ernest A. [ernest.tuckett@akzonobel.com]; Utecht, Andrea E. [andrea_utecht@fmc.com]; Valente, Michael W [michael.valente@versumaterials.com]; Van Horn, James R. [jim.vanhorn@sunchemical.com]; West, Rudy [rudy.west@newmarket.com]; Williams, David E. [david.e.williams@innospecinc.com]
CC: Ling, Simeon [simeon.ling@squirepb.com]; Smith, Shirley A. [shirley.smith@squirepb.com]
Subject: 2018 Roundtable for General Counsel in the Chemical and Performance Materials Industry

Hi everyone. The 12th Annual Roundtable will be held April 5-6, 2018. More details to follow. Best. C



2018 Roundtable for General Counsel in the Chemical and Performance Materials Industry

Save the Date

April 5-6, 2018

Please save April 5-6, 2018 for our 12th Annual Roundtable for General Counsel in the Chemical and Performance Materials Industry, to be held in Washington DC.

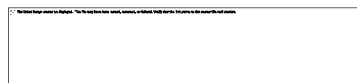
Guided by a steering committee of industry general counsel (noted to the right), the roundtable will bring together leading practitioners and officials in industry and government for this invitation-only event.

There is no cost for attending and CLE credits will be available. Updates regarding the venue and the agenda will follow soon.

Contact for Questions

Shirley A. Smith
+1 216 479 8064

Hope to see you there.



Carolyn J. Buller
Partner and Chair Global Chemicals Practice
Squire Patton Boggs
T +1 212 872 9850
E carolyn.buller@squirepb.com

Steering Committee

Eric A. Blanchard
Vice President, General Counsel
and Secretary
Olin Corporation

Peter J. Ganz
Senior Vice President,
General Counsel and Secretary
Ashland Global Holdings Inc.

Douglas A. Johns
Executive Vice President,
General Counsel and Secretary
Hexion Inc.

Karen G. Narwold
Executive Vice President and
Chief Administrative Officer
Albemarle Corporation

Naveena Shastri
Vice President and General
Counsel
SABIC

David C. Shelton
Senior Vice President, General
Counsel and Corporate Secretary
The Chemours Company

David M. Stryker
Executive Vice President,
General Counsel, Chief
Compliance Officer and Secretary
Huntsman

Jason R. Sussman
General Counsel
The Lubrizol Corporation

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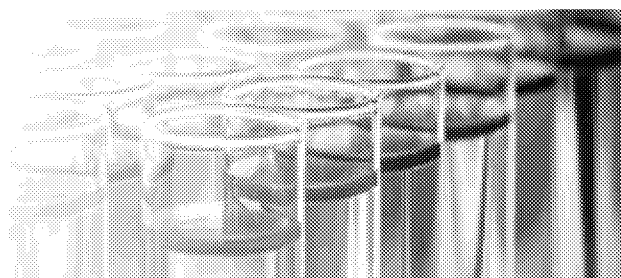
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**NORTH AMERICA
ROUNDTABLE FOR GENERAL COUNSEL IN THE
CHEMICAL AND PERFORMANCE MATERIALS INDUSTRY**

HISTORICAL ATTENDANCE

Company	Name and Title
Air Liquide USA LLC	Kevin M. Feeney Senior Vice President and Chief Legal Officer - Americas
Air Products and Chemicals, Inc.	John D. Stanley Senior Vice President, General Counsel and Chief Administrative Officer
AkzoNobel	Rogier Roelen, Director, Legal IP and Compliance Steven J. Miller, Senior Vice President and General Counsel, Legal and IP Ernest A. Tuckett III General Counsel Americas
Albemarle Corporation	Karen G. Narwold Executive Vice President, Chief Administrative Officer and General Counsel
A. Schulman, Inc.	Andreas R. Horton Executive Vice President, Chief Legal Officer and Secretary
Ashland Global Holdings Inc.	Peter J. Ganz Senior Vice President, General Counsel and Secretary
BASF Corporation	Matthew Lepore Senior Vice President and General Counsel
Cabot Corporation	Brian A. Berube Vice President and General Counsel
Celanese Corporation	Gjon N. Nivica Jr. Senior Vice President, General Counsel and Corporate Secretary
The Chemours Company	David C. Shelton Senior Vice President – General Counsel & Corporate Secretary

Company	Name and Title
Chevron Phillips Chemical Company	Timothy J. Hill Senior Vice President, Legal and Public Affairs, General Counsel and Secretary
Covestro LLC	Scott G. Brown Vice President, General Counsel, Secretary and Compliance Officer
Cristal USA Inc.	James G. Koutras Director-Senior Corporate Counsel and Secretary
CropLife America	Rachel G. Lattimore Senior Vice President and General Counsel
DuPont	Sharon A. Leyhow Associate General Counsel
Emery Oleochemicals	Gary Powell General Counsel, North America
Evonik Corporation	Gregory J. Mulligan Vice President, General Counsel and Secretary
ExxonMobil Chemical Company	Laurie A. Rachford General Counsel
Ferro Corporation	Mark H. Duesenberg Vice President, General Counsel and Secretary
FMC Corporation	Andrea E. Utecht Executive Vice President, General Counsel and Secretary
Hexion Inc.	Douglas A. Johns Executive Vice President and General Counsel
Huntsman Corporation	David M. Stryker Executive Vice President and General Counsel
INEOS	Charles T. Saunders General Counsel
Kemira Chemicals, Inc.	Susan B. Radcliffe General Counsel – Americas
Kraton Performance Polymers, Inc.	Steven W. Duffy Vice President, General Counsel and Secretary
The Lubrizol Corporation	Suzanne F. Day Senior Vice President and Chief Legal and Ethics Officer Jason R. Sussman General Counsel
Lucite International, Inc.	Pauletta J. Brown General Counsel

Company	Name and Title
LyondellBasell Industries	Jeffrey A. Kaplan Executive Vice President and Chief Legal Officer
Methanex Corporation	Kevin Price General Counsel and Corporate Secretary
Mexichem	Francisco Hernandez Corporate Vice President and General Counsel
Momentive Performance Materials	John D. Moran Senior Vice President and General Counsel
The Mosaic Company	Richard L. Mack Executive Vice President, General Counsel and Secretary
Olin Corporation	Eric A. Blanchard Vice President, General Counsel and Secretary
OMNOVA Solutions Inc.	James C. LeMay Senior Vice President-Corporate Development and General Counsel
PPG Industries, Inc.	Glenn E. Bost II Senior Vice President and General Counsel
Quaker Chemical Corporation	Robert Traub Vice President, General Counsel and Corporate Secretary
SABIC	Naveena Shastri Vice President and General Counsel
SI Group, Inc.	Thomas Masterson Vice President and General Counsel
Total Petrochemicals and Refining USA, Inc.	Elizabeth Matthews Vice President, General Counsel and Corporate Secretary
Umicore USA Inc.	Ravila Gupta Legal Counsel, North America
Univar Inc.	Amy E. Weaver Executive Vice President and General Counsel
Westlake Chemical Corporation	L. Benjamin Ederington Vice President, General Counsel and Secretary

Message

From: Verma, Puneet (puve) [PVerma@chevron.com]
Sent: 1/16/2018 9:31:24 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
CC: Bolen, Derrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1ffc58b0468c4deca51a8bad735b7d95-Bolen, Derr]
Subject: RE: X

Thank you Nancy, I will contact Derrick to arrange a time. If you would like to talk late today, my cell phone will be with me all evening. Personal Phone / Ex. 6

Regards,
Puneet

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Tuesday, January 16, 2018 4:27 PM
To: Verma, Puneet (puve) <PVerma@chevron.com>
Cc: Bolen, Derrick <bolen.derrick@epa.gov>
Subject: [**EXTERNAL**] X

Puneet,
Happy to chat if we can find a window. I have meetings til 6pm today and tomorrow looks equally crazy. Derrick can assist in finding a few minutes for a call this week.

Also, please reframe from putting CBI in our general email system.

Thanks,
Nancy

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

Personal Phone / Ex. 6
beck.nancy@epa.gov

From: Verma, Puneet (puve) [mailto:PVerma@chevron.com]
Sent: Tuesday, January 16, 2018 2:53 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: X

Nancy,
I hope your travels last week went well.

Can you please give me a call on my cell Personal Phone / Ex. 6 to discuss PMN PBI / Ex. 4? This is the same item Charlotte and I discussed last week. She was very helpful but I understand she is out of the office so I am following up with you. Some questions have come up in our internal discussions which I would like to seek your guidance on.

Thank you,
Puneet Verma
Chevron – Federal Government Affairs
600 13th Street, NW, Suite 600
Washington, DC 20005

Office: (202) 408-5807

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Message

From: Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]
Sent: 12/12/2017 3:47:34 PM
To: Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]
CC: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]; Mottley, Tanya [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33a000296a364b0dad31fb9aaa34605d-Mottley, Tanya]; Schweer, Greg [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4fe412a2024b4f548eeb02e7e931f484-GSchweer]; Mclean, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=869a9152d655420594d8f94a966b8892-KMCLEAN]; Grant, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ec6104b72cab42ba9b1e1da67d4288ae-Grant, Brian]
Subject: Serious Concerns about EPA Plans to Weaken the New Chemicals Program and Request to Halt Implementation
Attachments: SCHF PMN framework letter 12112017.pdf

Dear Dr. Morris:

We are writing to reinforce our deep concerns about the “framework” for new chemical review that EPA presented at its December 6 public meeting and to request that the Agency halt implementation of the framework while it reviews and addresses public comments and reexamines the framework’s legality. As explained in the attached letter, we believe the framework is contrary to the Toxic Substances Control Act (TSCA) and urge EPA to withdraw it after further analysis and consideration of public comments.

In sum, we urge EPA to put implementation of the new framework on hold indefinitely, review and respond to comments and reexamine whether the framework can be reconciled with the language and goals of TSCA. If it does nonetheless proceed with SNURs despite the illegality of the framework under TSCA, EPA should conduct a full notice-and-comment rulemaking for these rules in accordance with its SNUR regulations for new chemicals.

We ask that you respond in writing to the issues raised by this letter as soon as possible.

Please contact SCHF counsel Bob Sussman with any questions at bobsussman1@comcast.net.

Sincerely yours,

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families

cc: Dr. Nancy Beck
Dr. Maria Doa
Tonya Mottley
Greg Schweer
Kevin Mclean, Esq.
Brian Grant, Esq.

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families
202-794-8755
lizhitchcock@saferchemicals.org
www.saferchemicals.org

December 11, 2017

Dr. Jeff Morris
Acting Director, Office of Pollution Prevention and Toxics
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC 20460

Re: Serious Concerns about EPA Plans to Weaken the New Chemicals Program and Request to Halt Implementation

Dear Dr. Morris:

The undersigned groups are writing to reinforce our deep concerns about the “framework” for new chemical review that EPA presented at its December 6 public meeting and to request that the Agency halt implementation of the framework while it reviews and addresses public comments and reexamines the framework’s legality. As explained below, we believe the framework is contrary to the Toxic Substances Control Act (TSCA) and urge EPA to withdraw it after further analysis and consideration of public comments.

The premanufacture notice (PMN) program for new chemicals is one of the bedrock elements of TSCA. Its purpose is to ensure that protections of health and the environment are in place before new chemicals that may pose an unreasonable risk of harm or lack sufficient information for a reasoned determination of safety enter the marketplace. Careful reviews of new chemicals, accompanied by necessary restrictions on exposure, release, and use and testing requirements, are vital to prevent the widespread presence in the economy, products and the environment of substances later linked to cancer, learning disabilities, reproductive impacts and other health and environmental harms. The dangerous chemicals that escaped review before enactment of TSCA (PCBs, dioxin, asbestos, lead and vinyl chloride) and slipped through the review process under the previous version of the law (brominated flame retardants and perfluorinated compounds) underscore the importance of a strong and effective PMN program.

Rather than strengthen the program, however, the framework EPA outlined on December 6 would reverse recent progress, dismantle a long-standing PMN review process that is securely grounded in TSCA, and replace it with one that is legally dubious, poorly conceived and a major step backward in protecting health and the environment.

EPA ostensibly convened the December 6 public meeting to obtain feedback on the framework and has provided until January 28 for submission of written comments. Yet EPA revealed at the meeting that, rather than reviewing and considering public input, it is instead pushing ahead to implement the framework even though it raises many basic unanswered legal and policy questions under TSCA. To proceed with implementation under these circumstances reflects an alarming indifference to

public input and a reckless rush to judgment in the face of serious concerns about the Agency's approach.

We urge EPA to suspend implementation of the framework indefinitely and instead to review and respond to the public comments and reevaluate the far-reaching changes in the PMN program under consideration. We expect this analysis will demonstrate that EPA is required to issue 5(e) orders whenever it has concerns with intended or reasonably foreseen conditions of use of a PMN chemical and cannot address these concerns solely by issuance of Significant New Use Rules (SNURs). If EPA nonetheless decides to proceed with such SNURs despite the statutory requirement to issue section 5(e) orders, it must conduct a full notice-and-comment rulemaking on each SNUR so the public has an adequate opportunity to present its views, as required by the Administrative Procedure Act (APA) and EPA's SNUR regulations.

TSCA Does Not Authorize EPA to Forego Section 5(e) Orders When Intended or Reasonably Foreseen Conditions of Use May Present an Unreasonable Risk or cannot be Evaluated Because of Insufficient Information

In the 2016 Frank H. Lautenberg Chemical Safety for the 21st Century Act (LCSA) amending TSCA, Congress strengthened the PMN program significantly, requiring EPA to make an *affirmative determination of the potential risks of every new chemical*. Thus, EPA can no longer allow the PMN review period to expire without explicitly addressing the chemical's safety. If it concludes that the new chemical may present an unreasonable risk, the Agency lacks sufficient information for an informed risk evaluation, or the chemical has or may have substantial production volume and exposure, EPA *must issue an order under section 5(e)* to restrict activities involving the chemical and/or require testing. This obligation is non-discretionary. The only occasion where no action is required is when EPA determines that the chemical *is not likely to present an unreasonable risk, including to workers and other vulnerable populations*. Thus, EPA cannot simply allow production to begin by default: if it does not regulate the chemical under section 5(e), it has an *obligation to demonstrate by credible evidence that the chemical is unlikely to harm health or the environment*.

For the first several months following enactment of LCSA, EPA staff diligently worked toward the goals of the new law. After careful review, the agency found that in many cases it either had insufficient information to permit a reasoned evaluation and/or that under known, intended, or reasonably foreseen conditions of use, the PMN substance may present unreasonable risks. As a result, it subjected many more new chemicals to section 5(e) orders, placing limits on human exposure and environmental release and increasing the amount of testing required to better understand the potential hazards posed by the chemicals under review. But chemical manufacturers mounted relentless and misleading attacks on EPA's supposed "overreaching," based on a distorted view of the requirements of the new law. In response, the political leadership of EPA (which includes a former official of the American Chemistry Council, Dr. Nancy Beck) intervened to roll back the program improvements that the staff had adopted to comply with LCSA.

The framework presented on December 6 reflects this effort to radically deconstruct the PMN program to appease industry at the expense of public health. It seeks to turn the new law on its

head by dramatically reducing the use of section 5(e) orders, the principal tool under the old and new laws to address the risks of new chemicals of concern.

As the first step in curtailing the use of orders, EPA plans to evaluate the PMN substance based only on the “intended” use conditions identified in the PMN. Where these activities raise human health or environmental concerns that may present an unreasonable risk of injury, EPA would recommend limits on exposure and release that were not identified in the PMN and encourage the submitter to amend its PMN to incorporate them. Although the controls would be strictly voluntary, EPA would then rely on them to make a determination that the chemical is “unlikely to present an unreasonable risk.” Such an approach is wholly inadequate to protect the public, or comply with the law, since the conditions of use described in PMNs have no binding effect and are unenforceable unless they are formalized in a section 5(e) order. By contrast, EPA previously made “may present an unreasonable risk” findings on chemicals with potential health and environmental concerns and then used section 5(e) orders to impose enforceable restrictions that protect against the potential unreasonable risk. This is plainly the path that Congress directed EPA to follow.

As an additional basis for avoiding section 5(e) orders in these cases, EPA would presume that the available information on the PMN substance is “sufficient” for a determination of unreasonable risk even though its recommended controls are based on similarities to other chemicals that may be less hazardous than the PMN substance. In the past, section 5(e) orders have required both exposure controls and testing so that EPA can assess whether additional protections are needed based on fuller information. However, EPA’s new approach necessarily bypasses the important new requirement in amended TSCA to determine the sufficiency of information and to require testing under section 5(e) to fill critical information gaps while exposure and release are controlled.

Under EPA’s framework, a further step in avoiding section 5(e) orders is eliminating their use to address future uses of the PMN substance that “may present an unreasonable risk” and/or lack “sufficient information” for a reasoned evaluation of risk. This change in approach, too, is contrary to TSCA. EPA’s safety determinations and regulatory actions under section 5 are expressly required to address risks presented by a new chemical under its “conditions of use.” This term is defined under section 3(4) of TSCA to include the circumstances under which a chemical is “*reasonably foreseen* to be manufactured, processed, distributed in commerce, or disposed of” (emphasis added). If EPA identifies a reasonably foreseeable future use of the PMN substance raising concerns that meet the criteria for action under section 5(e), the law states that the Agency “shall” issue an order under that provision, whether the use is intended by the PMN submitter or not.

SNURs Are Not a Lawful or Adequately Protective Substitute for Section 5(e) Orders

Instead of complying with the plain terms of TSCA, EPA plans to substitute SNURs for section 5(e) orders both where the submitter amends its PMN to include additional exposure controls and where EPA identifies “reasonably foreseen” future uses of the new chemical that raise health or environmental concerns. But SNURs were never intended to be the primary mechanism for restricting and reducing the risks of new chemicals of concern, nor are they an effective means of doing so. Rather, when EPA determines that it lacks sufficient information to make a reasoned evaluation or the substance may present an unreasonable risk, “the Administrator *shall issue* an

order” pursuant to section 5(e) (emphasis added). In section 5(f)(4), TSCA as amended expressly recognizes that the role of SNURs is to build on section 5(e) orders by extending their requirements to other manufacturers and processors – not to substitute for these orders in the first instance. Indeed, this was EPA’s explicit understanding when it issued SNUR regulations in 1989 and throughout its implementation of the PMN program under the old law.

Not only are 5(e) orders legally required, they serve key protective functions in addressing new chemical risks that are not served by SNURs. Except where a section 5(e) order is in place, EPA has no legal obligation to issue SNURs for new chemicals. Accordingly, in contrast to orders, there is no requirement to put SNURs in place before a new chemical raising concerns is commercialized. Orders must be based on and incorporate explicit conclusions about the nature and magnitude of the new chemical’s risks but no such risk findings are required in SNURs. As a result, the level of protection that SNURs must afford is not defined in the law. By contrast, section 5(e) orders must prohibit or limit activities involving the restricted chemical “to the extent necessary to protect against an unreasonable risk of injury to health or the environment.” EPA can thus make SNUR provisions as weak or strong as it chooses. For this reason, the Agency has no obligation to include in SNURs all the protections now included in section 5(e) orders. For example, as EPA acknowledged at the public meeting, SNURs would **not** include the triggered testing requirements that are now an essential feature of many orders. An across-the-board shift from section 5(e) orders to SNURs would therefore mean much less protection and testing for new chemicals of concern.

EPA Should Halt Issuance of SNURs in Lieu of Section 5(e) Orders while It Considers Public Comments and Reexamines Whether There Is a Defensible Basis for Its Framework under TSCA

Given the sweeping and fundamental changes it would make in the TSCA new chemicals program, it is troubling that the only paper EPA has released describing the framework is a mere five pages in length. It contains no legal analysis, despite the seeming conflict between EPA’s approach and the text and goals of LCSEA. It avoids basic and unresolved issues, such as the timing of SNURs in relation to the end of the PMN review period and the commencement of production of the new chemical, a subject that EPA acknowledged at the public meeting remains under debate. And nowhere does the paper discuss the provisions that SNURs will contain and whether and how they will assure that the protections that would be required under section 5(e) orders will be effectively implemented throughout the new chemical’s life-cycle and supply chain.

Despite the many concerns and questions raised at the public meeting, EPA acknowledged after being pressed by stakeholders that it is not waiting for public comments to implement the new framework but is in fact currently working on a number of SNURs to be used in lieu of 5(e) consent orders and may issue them imminently. Promulgating these SNURs in the middle of the comment process would be irresponsible and make a mockery of EPA’s purported commitment to transparency and meaningful public engagement. As emphasized above, EPA should instead put the SNURs on hold indefinitely, review and respond to the public comments and reexamine whether the framework is defensible and lawful in light of the express language and goals of amended TSCA. We believe this process will result in withdrawal of the framework.

To Comply with its Regulations, EPA Must Conduct a Full Notice-and-Comment Rulemaking on Any SNURs it Issues Based on the Framework

Although we believe EPA should halt work on SNURs intended to substitute for section 5(e) orders, a meaningful notice-and-comment process is essential under the APA and EPA's SNUR regulations should EPA nonetheless begin issuing such SNURs precipitously.

Distressingly, we understand that EPA instead intends to truncate the rulemaking process by publishing the SNURs as direct final rules and allow only 15 days for interested parties to signify their intent to comment and submit the comments themselves. This is contrary to the commitment to full rulemaking procedures for controversial new chemical SNURs that EPA made in the preamble to its 1989 SNUR regulations:

“EPA expects to follow notice and comment rulemaking procedures to issue SNURs in cases where it expects adverse or critical public comments on a SNUR. While this option maximizes the period during which a person may engage in the activity EPA intends to regulate under a SNUR, it also gives maximum public notice, and ensures a full period to address any significant issues.” 54 Federal Register 31298, 31299 (July 27, 1989).

Clearly, EPA has every reason to expect that its first SNURs under the new framework will engender “adverse or critical public comments” and raise “significant issues.” A full rulemaking process under the APA is thus required.

Even if “direct final rulemaking” were appropriate, the SNUR regulations prescribe a very specific process that EPA must follow. 40 CFR 721.170(d)(4)(i)(B) describes this process as follows:

“The Federal Register document will state that, unless written notice is received by EPA within 30 days after the date of publication that someone wishes to submit adverse or critical comments, the SNUR will be effective 60 days from date of publication. The written notice of intent to submit adverse or critical comments should state which SNUR(s) will be the subject of the adverse or critical comments, if several SNURs are established through the direct final rule. If notice is received within 30 days after the date of publication that someone wishes to submit adverse or critical comments, the section(s) of the direct final rule containing the SNUR(s) for which a notice of intent to comment was received will be withdrawn by EPA issuing a document in the final rule section of the Federal Register, and EPA will issue a proposed rule in the proposed rule section of the Federal Register. The proposed rule will establish a 30-day comment period.”

EPA is thus precluded by its own regulations from collapsing the two-step process for direct final rules into a single step and allowing only 15 days for comments instead of the 60 required by the regulations. It must instead provide 30 days for interested parties to signify an intent to submit comments, withdraw the direct final rule and publish a proposed rule in the Federal Register, allow 30 additional days for submission of comments, and then either withdraw or finalize the SNUR together with a response to the comments received. It will be unlawful if EPA deviates from this process.

In sum, we urge EPA to put implementation of the new framework on hold indefinitely, review and respond to comments and reexamine whether the framework can be reconciled with the language and goals of TSCA. If it does nonetheless proceed with SNURs despite the illegality of the framework under TSCA, EPA should conduct a full notice-and-comment rulemaking for these rules in accordance with its SNUR regulations for new chemicals.

We ask that you respond in writing to the issues raised by this letter as soon as possible.

Please contact SCHF counsel Bob Sussman with any questions at bobsussman1@comcast.net.

Sincerely yours,

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families

Daniel Rosenberg, Senior Attorney
Natural Resources Defense Council

Eve Gartner, Staff Attorney
Earthjustice

Ansje Miller, Director of Policy and
Partnerships
Center for Environmental Health

Patrick MacRoy, Deputy Director
Environmental Health Strategy Center

cc: Dr. Nancy Beck
Dr. Maria Doa
Tonya Mottley
Greg Schweer
Kevin Mclean, Esq.
Brian Grant, Esq.

Message

From: Gimlin, Peter [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=060960590FC242DAA65C8532E11DA375-PGIMLIN]
Sent: 1/16/2018 8:55:36 PM
To: Jen Dickman [jendickman@saferchemicals.org]
CC: Liz Hitchcock - Safer Chemicals [lizhitchcock@saferchemicals.org]; Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Wolf, Joel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=88818c211b5446e1ad11d6c0dcf2a476-Wolf, Joel]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]
Subject: RE: SCHF et al. comments on 2,4,6-TTBP

Dear Jennifer,

Got it. Thank you for providing comments!

Regards, Peter

Peter Gimlin
Environmental Protection Specialist
Fibers and Organics Branch/NPCD/OPPT
U.S. Environmental Protection Agency
tel. 202-566-0515, email: gimlin.peter@epa.gov

From: Jen Dickman [mailto:jendickman@saferchemicals.org]
Sent: Tuesday, January 16, 2018 3:07 PM
To: Gimlin, Peter <Gimlin.Peter@epa.gov>
Cc: Liz Hitchcock - Safer Chemicals <lizhitchcock@saferchemicals.org>; Morris, Jeff <Morris.Jeff@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Wolf, Joel <Wolf.Joel@epa.gov>; Doa, Maria <Doa.Maria@epa.gov>
Subject: SCHF et al. comments on 2,4,6-TTBP

Dear Peter:

On Friday, Safer Chemicals, Healthy Families and partner organizations submitted comments to EPA's docket for 2,4,6-Tris(tert-butyl) phenol (EPA-HQ-OPPT-2016-0734) via Regulations.gov. These comments focused on the broad goals and requirements of TSCA section 6(h) and provided specific use and exposure information on this PBT that will enhance EPA's understanding of its presence in products, workplaces and the environment.

Our submission is available at the following link: <http://saferchemicals.org/sc/wp-content/uploads/2018/01/SCHF-et-al-246-TTBP-comments-1.12.18.pdf>

Please let us know if you have any questions.

Best,

Jennifer Dickman
Program Associate
Safer Chemicals, Healthy Families

(202) 794-8757

Message

From: Schaaff, Lesley [lschaaff@hess.com]
Sent: 1/10/2018 5:14:47 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Bertrand, Charlotte [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f044d768e05842e1b75321ff6010e1b8-Bertrand, Charlotte]; Puneet Verma [PVerma@chevron.com]
Subject: Connection

Hi Nancy and Charlotte. I wanted to introduce you to my good friend and colleague Puneet Verma who is Chevron's DC representative on environmental issues. I met Puneet shortly after I left EPA and he has been an invaluable resource in helping me navigate the industry. I believe Chevron has been working with some of your folks recently, so I thought that I would make the connection. Hope you both are well and having a great 2018 so far!

Lesley

Lesley Schaaff
Senior Manager, Regulatory Affairs
Government & External Affairs
HESS CORPORATION
Office: 202-263-1012
Cell: Personal Phone / Ex. 6
lschaaff@hess.com

Message

From: Michael Dourson [Personal Email / Ex. 6 gmail.com]
Sent: 1/19/2018 7:41:10 PM
To: BOOBIS Alan [a.boobis@imperial.ac.uk]; BRUNE, JOSEPH M CTR USN AFMC NAMRU/Dayton [joseph.brune.2.ctr@us.af.mil]; Ryan_Baldwin@americanchemistry.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bd3b0a608e0d4d9ba5fada9a01e2f218-Ryan_Baldwin@americanchemistry.com]; barbara.morin@dem.ri.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ac69aee6e2074f2392555f92352e4ef3-barbara.morin@dem.ri.gov]; Barbara Beck [bbeck@gradientcorp.com]; MBasu@gmaonline.org [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2a899af4afae4803b245561c4363fd25-MBasu@gmaon]; Batoon, Audrey [Audrey.Batoon@Chemtura.com]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Ben Clement [bclement@burnsmcd.com]; Ben Stanphill [ben.stanphill@arcadis-us.com]; Benford, Diane [Diane.Benford@foodstandards.gsi.gov.uk]; Benjamin Davies [benjamin.davies@icmm.com]; Benny Dehghi [benny.dehghi@honeywell.com]; Benson, Bob [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ccd3c8d2700447d2a9cc695b9a73340a-Benson, Bob]; Bertrand Langlet [bertrand.langlet@hc-sc.gc.ca]; Bette Meek [bmeek@uottawa.ca]; bhat@nsf.org [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8ecfc126e10f480d9c4f028e0cc3ea5e-bhat@nsf.org]; Sundar, Bhooma [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a2f788f7db4497b8c48309043cdc005-BSundar]; Bill Goulet [bill.goulet@axiall.com]; Bing Wang [bingwang23@gwu.edu]; Birnbaum, Linda (NIH/NIEHS) [E] [birnbaum@niehs.nih.gov]; Blais, Matthew [matthew.blais@swri.org]; Blayne Hartman [blayne@hartmaneg.com]; Benson, Bob [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ccd3c8d2700447d2a9cc695b9a73340a-Benson, Bob]; Bob Thielke [rthielke@trininc.com]; Bobst, Sol [SBobst@nexeosolutions.com]; Boekelheide, Kim [kim_boekelheide@brown.edu]; Bonnie Brooks [bonnie.brooks@state.mn.us]; Boobis, Alan R [a.boobis@imperial.ac.uk]; Booker, Susan M (NIH/NIEHS) [E] [booker@niehs.nih.gov]; Brad Schwie [bcs@barr.com]; Brad Weaver [brad.weaver@celanese.com]; Bradley Gentry [bgentry@iwmconsult.com]; Bradley, Kevin [kbradley@bsef.org]; Brayden Ford [bford@bizinfogroup.ca]; Brenda Seidman [seidman.brenda@epa.gov]; Brent Chapman [bchapman@gfnet.com]; BHicks1@idem.IN.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a8bc8138089b4f059d4a07d023f7058f-BHicks1@idem.IN.gov]; roger.brewer@doh.hawaii.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0751cf70ccd24e67923cf60b935cdb5-roger.brewer@doh.hawaii.gov]; Brian Cochran [bcochran@aeiconsultants.com]; Brian Howard (william.howard.40@us.af.mil) [william.howard.40@us.af.mil]; Brian Roden [brian.roden@amec.om]; Bridget O'Brien [obrien.bridget@epa.gov]; mcatee@ppg.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7aa1bdbc318460e83c1c6b18a6aff7d-mcatee@ppg.com]; Brogdon, Aaron T [aaron.brogdon@squirepb.com]; Bruce Allen (bruce.c.allen@outlook.com) [bruce.c.allen@outlook.com]; Bruce Bernel [Bruce.Bernel@firstmerit.com]; Bryan Elledge [bryan.elledge@kochind.com]; Bryan Leece [bryan.leece@stantec.com]; burleighflayer@ppg.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4176125deb042129502188461413347-burleighflayer@ppg.com]; Burman, Shelley (MPCA) [Shelley.Burman@state.mn.us]; Burr, Alexa [Alexa_Burr@americanchemistry.com]
Subject: EPA Nomination

Dear Colleagues

As many of you know, President Trump nominated me last summer to be the Assistant Administrator for the Office of Chemical Safety and Pollution Prevention in the US EPA. The nomination was quite exciting, but also humbling. I accepted and joined EPA as a senior advisor to the Administrator while waiting for US Senate confirmation. The ensuing months of web-based stories about my work at the nonprofit 501c3 Toxicology Excellence for Risk Assessment (TERA) and the University of Cincinnati were surprising. Seldom mentioned was TERA's balance of work between industry and government (1/3 industry, 2/3 government, see www.tera.org/funding), or

multiple sector collaborations such as Beyond Science and Decisions (<http://med.uc.edu/eh/centers/rsc/risk-resources/dose-response-framework>), or TERA's extensive peer review program (<http://tera.org/Peer/MeetingReports/index.html>), or TERA's publicly available databases, such as the International Toxicity Estimates for Risk (<https://toxnet.nlm.nih.gov/newtoxnet/iter.htm>). Moreover, selected projects were extensively mischaracterized, responses to which can now be viewed at <http://www.tera.org/TERAcollaborativework%2012.8.17.pdf>.

In order to avoid unnecessarily politicizing the important environmental protection goals of Administrator Pruitt, I asked President Trump last month to withdraw my name for consideration of this EPA position. The office is currently being lead under the capable hands of Charlotte Bertrand, Nancy Beck and Louise Wise.

I sincerely and deeply appreciate all the support from many of you during this confirmation process. I also look forward to continue working with you to protect both human health and the ecosystem from toxic levels of chemical exposures.

Cheers!

Michael...

...L. Dourson, Ph.D., DABT, FATS, FSRA

4303 Kirby Avenue
Cincinnati OH 45223

---Those who have the privilege to know, have the duty to act. Albert Einstein

Message

From: Feustel, Ingrid [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FEUSTEL, INGRID]
Sent: 1/16/2018 8:17:33 PM
To: Jen Dickman [jendickman@saferchemicals.org]; Mojica, Andrea [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f47e2a2bfb4434aa9cc1e8c2a385da3-Andrea Mojica]
CC: Liz Hitchcock - Safer Chemicals [lizhitchcock@saferchemicals.org]; Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Wolf, Joel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=88818c211b5446e1ad11d6c0dcf2a476-Wolf, Joel]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]
Subject: RE: SCHF comments on Phenol, isopropylated, phosphate (3:1)

Hi Jennifer,

Thank you so much! We have received and are currently reviewing your comments.

Best,
Ingrid

Ingrid S. Feustel
Existing Chemicals Branch
U.S. EPA/OCSP/OPPT/CCD
202-564-3199
Feustel.Ingrid@epa.gov

From: Jen Dickman [mailto:jendickman@saferchemicals.org]
Sent: Tuesday, January 16, 2018 3:02 PM
To: Feustel, Ingrid <feustel.ingrid@epa.gov>; Mojica, Andrea <Mojica.andrea@epa.gov>
Cc: Liz Hitchcock - Safer Chemicals <lizhitchcock@saferchemicals.org>; Morris, Jeff <Morris.Jeff@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Wolf, Joel <Wolf.Joel@epa.gov>; Doa, Maria <Doa.Maria@epa.gov>
Subject: SCHF comments on Phenol, isopropylated, phosphate (3:1)

Dear Ingrid and Andrea:

On Friday, Safer Chemicals, Healthy Families and partner organizations submitted comments to EPA's docket for phenol, isopropylated, phosphate (3:1) (EPA-HQ-OPPT-2016-0730) via Regulations.gov. These comments focused on the broad goals and requirements of TSCA section 6(h) and provided specific use and exposure information on this PBT that will enhance EPA's understanding of its presence in products, workplaces and the environment.

Our submission is available at the following links:

Comments on broad goals and requirements: http://saferchemicals.org/sc/wp-content/uploads/2018/01/SCHF-PBT-comments_1-12-18-final.pdf

Technical report: http://saferchemicals.org/sc/wp-content/uploads/2018/01/Phenol-isopropylated-phosphate-3_1-TSCA-Technical-Report-1.12.18.pdf

EJSCREEN Reports:

1. ICL-IP America, Inc: <http://saferchemicals.org/sc/wp-content/uploads/2018/01/1-EJSCREEN-ICL-IP-America-Gallipolis-Ferry-WV.pdf>
2. Chevron Oronite Co: <http://saferchemicals.org/sc/wp-content/uploads/2018/01/2-EJSCREEN-Chevron-Oronite-Co-Belle-Chasse-LA.pdf>
3. Akzo Nobel (Houston, TX): <http://saferchemicals.org/sc/wp-content/uploads/2018/01/3-EJSCREEN-Akzo-Nobel-International-Paint-Houston-TX.pdf>

4. Akzo Nobel (Union, NJ): <http://saferchemicals.org/sc/wp-content/uploads/2018/01/4-EJSCREEN-Akzo-Nobel-International-Paint-Union-NJ.pdf>

Please let us know if you have any questions.

Best,

Jennifer Dickman
Program Associate
Safer Chemicals, Healthy Families
(202) 794-8757

Message

From: Jen Dickman [jendickman@saferchemicals.org]
Sent: 1/16/2018 8:02:00 PM
To: Feustel, Ingrid [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Feustel, Ingrid]; Mojica, Andrea [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f47e2a2bfb4434aa9cc1e8c2a385da3-Andrea Mojica]
CC: Liz Hitchcock - Safer Chemicals [lizhitchcock@saferchemicals.org]; Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Wolf, Joel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=88818c211b5446e1ad11d6c0dcf2a476-Wolf, Joel]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]
Subject: SCHF comments on Phenol, isopropylated, phosphate (3:1)
Flag: Flag for follow up

Dear Ingrid and Andrea:

On Friday, Safer Chemicals, Healthy Families and partner organizations submitted comments to EPA's docket for phenol, isopropylated, phosphate (3:1) (EPA-HQ-OPPT-2016-0730) via Regulations.gov. These comments focused on the broad goals and requirements of TSCA section 6(h) and provided specific use and exposure information on this PBT that will enhance EPA's understanding of its presence in products, workplaces and the environment.

Our submission is available at the following links:

Comments on broad goals and requirements: http://saferchemicals.org/sc/wp-content/uploads/2018/01/SCHF-PBT-comments_1-12-18-final.pdf

Technical report: http://saferchemicals.org/sc/wp-content/uploads/2018/01/Phenol-isopropylated-phosphate-3_1-TSCA-Technical-Report-1.12.18.pdf

EJSCREEN Reports:

1. ICL-IP America, Inc: <http://saferchemicals.org/sc/wp-content/uploads/2018/01/1-EJSCREEN-ICL-IP-America-Gallipolis-Ferry-WV.pdf>
2. Chevron Oronite Co: <http://saferchemicals.org/sc/wp-content/uploads/2018/01/2-EJSCREEN-Chevron-Oronite-Co-Belle-Chasse-LA.pdf>
3. Akzo Nobel (Houston, TX): <http://saferchemicals.org/sc/wp-content/uploads/2018/01/3-EJSCREEN-Akzo-Nobel-International-Paint-Houston-TX.pdf>
4. Akzo Nobel (Union, NJ): <http://saferchemicals.org/sc/wp-content/uploads/2018/01/4-EJSCREEN-Akzo-Nobel-International-Paint-Union-NJ.pdf>

Please let us know if you have any questions.

Best,

Jennifer Dickman
Program Associate
Safer Chemicals, Healthy Families
(202) 794-8757

Message

From: Jen Dickman [jendickman@saferchemicals.org]
Sent: 1/16/2018 8:07:01 PM
To: Gimlin, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=060960590fc242daa65c8532e11da375-Pgimlin]
CC: Liz Hitchcock - Safer Chemicals [lizhitchcock@saferchemicals.org]; Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Wolf, Joel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=88818c211b5446e1ad11d6c0dcf2a476-Wolf, Joel]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]
Subject: SCHF et al. comments on 2,4,6-TTBP

Dear Peter:

On Friday, Safer Chemicals, Healthy Families and partner organizations submitted comments to EPA's docket for 2,4,6-Tris(tert-butyl) phenol (EPA-HQ-OPPT-2016-0734) via Regulations.gov. These comments focused on the broad goals and requirements of TSCA section 6(h) and provided specific use and exposure information on this PBT that will enhance EPA's understanding of its presence in products, workplaces and the environment.

Our submission is available at the following link: <http://saferchemicals.org/sc/wp-content/uploads/2018/01/SCHF-et-al-246-TTBP-comments-1.12.18.pdf>

Please let us know if you have any questions.

Best,

Jennifer Dickman
Program Associate
Safer Chemicals, Healthy Families
(202) 794-8757

Message

From: Holm, Stewart [Stewart_Holm@afandpa.org]
Sent: 7/16/2018 7:39:13 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: Sushi
Attachments: ATT00001.txt

Hi, see you in a few hours.

Stewart

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Tuesday, July 10, 2018 5:28 PM
To: Holm, Stewart <Stewart_Holm@afandpa.org>
Subject: RE: Sushi

Ok. Have a great rest of the week/weekend!

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

Personal Phone / Ex. 6

beck.nancy@epa.gov

From: Holm, Stewart [mailto:Stewart_Holm@afandpa.org]
Sent: Tuesday, July 10, 2018 5:15 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: RE: Sushi

Yes. See you there.

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Tuesday, July 10, 2018 5:14 PM
To: Holm, Stewart <Stewart_Holm@afandpa.org>
Subject: RE: Sushi

6:45 ok?

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

Personal Phone / Ex. 6

beck.nancy@epa.gov

From: Holm, Stewart [mailto:Stewart_Holm@afandpa.org]
Sent: Tuesday, July 10, 2018 5:11 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: RE: Sushi

Yes, let's do it.

Thanks,

Stewart

Stewart Holm

Chief Scientist
AMERICAN WOOD COUNCIL
1101 K Street, NW, Suite 700, Washington, DC 20005
Office: 202-463-2709
Email: sholm@awc.org



From: Beck, Nancy [<mailto:Beck.Nancy@epa.gov>]
Sent: Tuesday, July 10, 2018 5:08 PM
To: Holm, Stewart <Stewart_Holm@afandpa.org>
Subject: RE: Sushi

Yes! Monday the 16th?

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

Personal Phone / Ex. 6

beck.nancy@epa.gov

From: Holm, Stewart [mailto:Stewart_Holm@afandpa.org]
Sent: Tuesday, July 10, 2018 4:41 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: Sushi

Hi Nancy,

Well your deadlines are over and the 4th of July is done. It sounds to me that Sushi is in order. I'm open all next week. Hope one of those days works for you.

Thanks,

Stewart

Stewart Holm

Chief Scientist

AMERICAN WOOD COUNCIL

1101 K Street, NW, Suite 700, Washington, DC 20005

Office: 202-463-2709

Email: sholm@awc.org



The content image001.jpg of type has been blocked.

Message

From: Verma, Puneet (puve) [PVerma@chevron.com]
Sent: 1/16/2018 7:53:18 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: PMN P-17-0283

Nancy,
I hope your travels last week went well.

Can you please give me a call on my cell Personal Phone / Ex. 6, to discuss PMN PBI / Ex. 4? This is the same item Charlotte and I discussed last week. She was very helpful but I understand she is out of the office so I am following up with you. Some questions have come up in our internal discussions which I would like to seek your guidance on.

Thank you,
Puneet Verma
Chevron – Federal Government Affairs
600 13th Street, NW, Suite 600
Washington, DC 20005
Office: (202) 408-5807

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Message

From: Jen Dickman [jendickman@saferchemicals.org]
Sent: 1/16/2018 7:48:19 PM
To: Edmonds, Marc [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ed31dcc62754411aae5e1be96ed01f1d-MEdmonds]
CC: Liz Hitchcock - Safer Chemicals [lizhitchcock@saferchemicals.org]; Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Wolf, Joel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=88818c211b5446e1ad11d6c0dcf2a476-Wolf, Joel]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]
Subject: SCHF et al. PCTP and HCBd comments

Dear Marc:

On Friday, Safer Chemicals, Healthy Families and partner organizations submitted comments to EPA's PBT dockets for PCTP (EPA-HQ-OPPT-2016-0739) and HCBd (EPA-HQ-OPPT-2016-0738) via Regulations.gov. These comments focused on the broad goals and requirements of TSCA section 6(h) and provided specific use and exposure information on each PBT that will enhance EPA's understanding of their presence in products, workplaces and the environment.

Our submissions are available at the following links:

PCTP: <http://saferchemicals.org/sc/wp-content/uploads/2018/01/SCHF-PCTP-comments-1.12.18.pdf>

HCBd: <http://saferchemicals.org/sc/wp-content/uploads/2018/01/SCHF-et-al.-HCBd-comments-1.12.18.pdf>

Please let us know if you have any questions.

Best,

Jennifer Dickman
Program Associate
Safer Chemicals, Healthy Families
(202) 794-8757

Message

From: Alan Schreiber [aschreib@centurytel.net]
Sent: 7/17/2018 8:56:18 PM
To: Richard.ambrose@fmc.com; David Campana [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userc27ce58d]; acarson@nichino.net; timothy.ciarlo@fmc.com; astrid@goplenag.com; Heather@wafriends.org; michelle@wawg.org; info@cannabisalliance.us; jmkelsay@dow.com; patsy.laird@syngenta.com; Lavine@wsu.edu; madden@nwhort.org; macmcdonough@roatm.com; Niamhm@amvac-chemical.com; philipsc@iskbc.com; raedera@iskbc.com; Creeves@wcdst.com; aschreib@centurytel.net; kristie.shomsky@nutrien.com; David Campana [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userc27ce58d]; y.tanaka@nisoamerica.com; pltellez@tkinet.com; khvaiente@tkinet.com; richardz@amvac-chemical.com; aldrifge.ashlee@epa.gov; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Davis, Donna [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5dc6319e5dea4e28b4d2c429de260b80-Donna S Davis]; Bertrand, Charlotte [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f044d768e05842e1b75321ff6010e1b8-Bertrand, Charlotte]; mblua@potatoes.com; oborges@agr.wa.gov; Stacey.callaway@ecy.wa.gov; ken.camp@ecy.wa.gov; greg.caron@ecy.wa.gov; wayne.clifford@doh.wa.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=85477e39ac514d06bc938a1c4ab7ee2f-wayne.clifford@doh.wa.gov]; kmdavis@agr.wa.gov; srflanagan@ucdavis.edu; gonu235@lni.wa.gov; jhancock@agr.wa.gov; harty_thomas@epoa.gov; letsggo@gmail.com; mjhorak@ucdavis.edu; bill.jenkin@leg.wa.gov; lauren.jenks@doh.wa.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b8e79e671b83418bb9fa7f1d375b9691-lauren.jenk]; jkangiser@agr.wa.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3bf8a95842ad47b28d8f3020e1e79999-jkangiser@agr.wa.gov]; clyons@agr.wa.gov; kmclain@agr.wa.gov; anickelson@agr.wa.gov; snovack@njaes.rutgers.edu; Oman235@lni.wa.gov; lopb235@lni.wa.gov; Park, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=abb4baebd71e4e5681506576ee076c1c-Park, Jenni]; peever@wsu.edu; thomas.pike@rutgers.edu; andrew_raabe@fws.gov; rosh235@lni.wa.gov; Welch, Kara [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fc6864409c9149999c3da1aba7d8a3d6-Welch, Kara]
CC: 'Jim Zahand' [jpszahand@outlook.com]; j.garcia@centurytel.net
Subject: 2018 Washington Pest Control Tour

Hello Tour Attendees,

A week from today is the first full day of the 2018 Washington Pest Control Tour. I hope you are ready and want to go over or reiterate some points.

Some Like It Hot! The high for Tuesday is 98, Wednesday is 100 and Thursday is 99. And, yes, this is a dry heat. This is typical eastern Washington late July weather and we are prepared for it. Everybody will get a Tour water bottle and we will always have to 5 gallon containers of iced water to fill your water bottle. We also will have iced coolers of assorted drinks that will be available at every stop. The bus is air conditioned but these temperatures will tax its limitations. The AC has to be shut off while on dirt roads. We will bring a 10 by 10 foot canopy so we can have shade at certain stops. If anyone feels they are getting too hot you can get in the two chase vehicles which will be quite cool. We will have sun screen for you. Dress appropriately.

Dress for Success! The only time I might even think of dressing up a notch might be at the Reception. Otherwise, you need to dress for hot weather and outdoors. No open toed shoes except for the one person who tore a ligament and is in a boot-you get an exception. If you want to wear shorts, fine with me. Wear sturdy shoes, boots or tennis shoes are good examples of what to wear.

Reception. There is a reception at 7 pm on Monday in Room 1314. It would be good if you can make it to the reception so we can register you and pass off some material and give you the Tour Orientation. There will be plenty of food and beverages at the reception.

Logistics. If you are flying in, the Pasco Red Lion has a shuttle and is only a half a mile or less away from the airport. 509 547 0701. On Tuesday, the bus leaves at 7 am. Sharp. If you show up at 7 am expect to see the bus pulling out of the parking lot. Please be in your seat by 6:55 at the latest. We will have coffee and tea available from 6:30 to 7:00 am. There will be a breakfast at the first stop each morning.

Economics. Once you arrive at the hotel, there should be no cost to you for the entire tour. You are responsible for your hotel bill and the cost of transportation to and from the overall Tour.

Tour Contact Numbers. Alan Schreiber 509 539 4537. Jim Zahand 509 994 8054.

We will go over this during the orientation, but... If something comes up, you need something, etc., let us know. Jim Zahand is sort of like the Tour Concierge. Jennifer is Tour Support. I am the Tour Ayatollah. If you need something or have an issue-and things always come up, let us know. We are prepared and are pretty resourceful.

We are really looking forward to the tour. If you have questions or concerns let us know.

Regards,

Alan Schreiber

Message

From: Jen Dickman [jendickman@saferchemicals.org]
Sent: 1/16/2018 7:40:00 PM
To: Wheeler, Cindy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=76334d08affb44dea16312fd009f8b05-CWheel02]
CC: Liz Hitchcock - Safer Chemicals [lizhitchcock@saferchemicals.org]; Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Wolf, Joel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=88818c211b5446e1ad11d6c0dcf2a476-Wolf, Joel]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]
Subject: DecaBDE comments

Dear Cindy:

On Friday, Safer Chemicals, Healthy Families and partner organizations submitted comments to EPA's DecaBDE PBT docket, focusing on the broad goals and requirements of TSCA section 6(h). Those comments are available at this link: http://saferchemicals.org/sc/wp-content/uploads/2018/01/SCHF-PBT-comments_1-12-18-final.pdf

Please let us know if you have any questions.

Best,

Jennifer Dickman
Program Associate
Safer Chemicals, Healthy Families
(202) 794-8757

Message

From: Morris, Jeff [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55C34872E6EA40CAB78BE910AEC63321-MORRIS, JEFF]
Sent: 1/12/2018 3:15:04 PM
To: Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]
CC: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]; Mottley, Tanya [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33a000296a364b0dad31fb9aaa34605d-Mottley, Tanya]; Schweer, Greg [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4fe412a2024b4f548eeb02e7e931f484-GSchweer]; Mclean, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=869a9152d655420594d8f94a966b8892-KMCLEAN]; Grant, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ec6104b72cab42ba9b1e1da67d4288ae-Grant, Brian]; Scheifele, Hans [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd4c2e03967741c2a8d643869c0681db-HScheifele]; Pierce, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=036313052e20472ca55f7733de62f969-APierce]
Subject: RE: Serious Concerns about EPA Plans to Weaken the New Chemicals Program and Request to Halt Implementation

Dear Ms. Hitchcock,

Thank you for your December 11 letter. We are working on responses to the issues raised in your letter.

All the best,

Jeff Morris

Jeffery T. Morris, PhD
Director, Office of Pollution Prevention & Toxics
US Environmental Protection Agency

1200 Pennsylvania Avenue, NW (MC-7401M)
Washington, DC 20460

Personal Phone / Ex. 6

From: Liz Hitchcock- Safer Chemicals [mailto:lizhitchcock@saferchemicals.org]
Sent: Tuesday, December 12, 2017 10:48 AM
To: Morris, Jeff <Morris.Jeff@epa.gov>
Cc: Beck, Nancy <Beck.Nancy@epa.gov>; Doa, Maria <Doa.Maria@epa.gov>; Mottley, Tanya <Mottley.Tanya@epa.gov>; Schweer, Greg <Schweer.Greg@epa.gov>; Mclean, Kevin <Mclean.Kevin@epa.gov>; Grant, Brian <Grant.Brian@epa.gov>
Subject: Serious Concerns about EPA Plans to Weaken the New Chemicals Program and Request to Halt Implementation

Dear Dr. Morris:

We are writing to reinforce our deep concerns about the “framework” for new chemical review that EPA presented at its December 6 public meeting and to request that the Agency halt implementation of the framework while it reviews and addresses public comments and reexamines the framework’s legality. As explained in the attached letter, we believe the framework is contrary to the Toxic Substances Control Act (TSCA) and urge EPA to withdraw it after further analysis and consideration of public comments.

In sum, we urge EPA to put implementation of the new framework on hold indefinitely, review and respond to comments and reexamine whether the framework can be reconciled with the language and goals of TSCA. If it does nonetheless proceed with SNURs despite the illegality of the framework under TSCA, EPA should conduct a full notice-and-comment rulemaking for these rules in accordance with its SNUR regulations for new chemicals.

We ask that you respond in writing to the issues raised by this letter as soon as possible.

Please contact SCHF counsel Bob Sussman with any questions at bobsussman1@comcast.net.

Sincerely yours,

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families

cc: Dr. Nancy Beck
Dr. Maria Doa
Tonya Mottley
Greg Schweer
Kevin Mclean, Esq.
Brian Grant, Esq.

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families
202-794-8755
lizhitchcock@saferchemicals.org
www.saferchemicals.org

Message


From: Jarabek, Annie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8B1DE54D48E1429C8129F6499211DBDB-JARABEK, ANNIE]
Sent: 11/30/2017 2:04:46 PM
To: Gail Charnley [charnley@healthriskstrategies.com]; bdgold@pitt.edu; camenzie@exponent.com; elanderson@exponent.com; stevencraiglewis@comcast.net; dourson.michael@gmail.com; abostrom@u.washington.edu; Margaret MacDonell [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=usere705e15d]; ragnar.lofstedt@kcl.ac.uk; rcantor@brg-expert.com; smkane55@gmail.com; roger.o.mcclellan@att.net; DPaustenbach@chemrisk.com; rwilliams@mercatus.gmu.edu; sdudley@gwu.edu; rbelzer@post.harvard.edu; lrhomborg@gradientcorp.com; ritas50@verizon.net; laughfox5@msn.com; resha.m.putzrath.civ@mail.mil; northworks@mindspring.com; neutralscience@gmail.com; jashatkin@gmail.com; roconnor@nsf.gov; Cristina.McLaughlin@fda.hhs.gov; laylward@summittoxicology.com; fhearl@cdc.gov; bmeek@uottawa.ca; tcoxdenver@aol.com; ortwin.renn@sowi.uni-stuttgart.de; lzeise@oehha.ca.gov; gmgray@gwu.edu; wiener@law.duke.edu; pwilliams@erisksciences.com; Katherine von Stackelberg [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user784e0503]; lcabbott@starpower.net; jpalma-oliveira@fp.ul.pt; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; bbeck@gradientcorp.com; timothypastoor@gmail.com; rreiss@exponent.com; jgoodman@gradientcorp.com; gary.marchant@asu.edu [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2af0a20c5bc54776830e3dcb858b0522-gary.marchant@asu.edu]; r.jeffrey.lewis@exxonmobil.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c38c7ff02df7405b868d54a639586df0-r.jeffrey.lewis@exxonmobil.com]; gpaoli@risksciences.com; jay.f.rouse.ctr@mail.mil; rkasperson@clarku.edu; khartley@lspgrp.com; tlewandowski@gradientcorp.com; ystevens@asu.edu; fboelter@rhprisk.com; rkashuba@exponent.com
Subject: RE: Tuesday Night Gourmands... 2017 edition

Hello Gail & Greeting Gourmands all!

I am unfortunately not attending the SRA this year so unable to attend.
Best wishes for the holidays and peace in the new year,

Annie

Annie M. Jarabek | Senior Science Advisor
National Center for Environmental Assessment (NCEA)
Office of Research and Development | U.S. EPA
B-243-01 Research Triangle Park, NC 27711
Mobile (*best way to reach me*): 919.637.6016 | Office: 919.541.4847

 *Go Green - print this email only if necessary*

From: Gail Charnley [mailto:charnley@healthriskstrategies.com]
Sent: Wednesday, November 29, 2017 10:50 PM
To: bdgold@pitt.edu; camenzie@exponent.com; elanderson@exponent.com; stevencraiglewis@comcast.net; dourson.michael@gmail.com; abostrom@u.washington.edu; Margaret MacDonell <macdonell@anl.gov>; ragnar.lofstedt@kcl.ac.uk; rcantor@brg-expert.com; smkane55@gmail.com; roger.o.mcclellan@att.net; DPaustenbach@chemrisk.com; rwilliams@mercatus.gmu.edu; sdudley@gwu.edu; rbelzer@post.harvard.edu; lrhomborg@gradientcorp.com; ritas50@verizon.net; laughfox5@msn.com; resha.m.putzrath.civ@mail.mil;

northworks@mindspring.com; neutralscience@gmail.com; jashatkin@gmail.com; roconnor@nsf.gov; Cristina.McLaughlin@fda.hhs.gov; laylward@summittoxicology.com; fhearl@cdc.gov; bmeek@uottawa.ca; tcoxdenver@aol.com; ortwin.renn@sowi.uni-stuttgart.de; lzeise@oehha.ca.gov; gmgray@gwu.edu; wiener@law.duke.edu; pwilliams@erisksciences.com; Katherine von Stackelberg <kvon@hsph.harvard.edu>; lcabbott@starpower.net; jpalma-oliveira@fp.ul.pt; Beck, Nancy <Beck.Nancy@epa.gov>; bbeck@gradientcorp.com; timothybastoor@gmail.com; rreiss@exponent.com; jgoodman@gradientcorp.com; gary.marchant@asu.edu; r.jeffrey.lewis@exxonmobil.com; gpaoli@risksciences.com; jay.f.rouse.ctr@mail.mil; rkasperson@clarku.edu; Jarabek, Annie <Jarabek.Annie@epa.gov>; khartley@lspgrp.com; tlewandowski@gradientcorp.com; ystevens@asu.edu; fboelter@rhprisk.com; rkashuba@exponent.com

Subject: Tuesday Night Gourmands... 2017 edition

Hello Fellow Gourmands!

The SRA annual meeting is fast approaching and you know what that (usually) means... TNG is fast approaching as well! This year's venue is Two Nineteen Restaurant in Old Town Alexandria, Virginia (motto: "New Orleans food is as delicious as the less criminal forms of sin.") The chef and I have developed a six-course menu with appropriately paired wines that I think will be very impressive. Another handy advantage of this venue is that there is a downstairs bar (Bayou Room) that offers a live DJ from 10:00 pm - 2:00 am with plenty of room for dancing, as well as a cigar and whiskey bar upstairs that offers live music daily— also with room for dancing. What's not to like??

The festivities will begin at 7 pm on Tuesday December 12th in the restaurant's Jackson Room. The address is 219 King Street, Alexandria. The price is \$150 including food, wine, tax, and gratuity. Please RSVP one way or the other by Thursday December 7th. You can mail a check to the address below, or hand me a check or cash at the event.

Looking forward to seeing y'all soon!

Cheers,
Gail

Gail Charnley PhD
HealthRisk Strategies LLC
222 11th St. NE
Washington, DC 20002
W: (202) 543-2408

Personal Phone / Ex. 6

charnley@healthriskstrategies.com
www.healthriskstrategies.com

Message

From: Bertrand, Charlotte [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F044D768E05842E1B75321FF6010E1B8-BERTRAND, CHARLOTTE]
Sent: 1/10/2018 11:35:15 PM
To: Verma, Puneet (puve) [PVerma@chevron.com]
CC: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: Connection

Hi Puneet –

It is a pleasure to e-meet you too. I just tried to reach you, I'll give you a call back tomorrow morning. Will be the best number to reach you at?

Best,
Charlotte

Charlotte Bertrand
Acting Principal Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention
Phone (202) 564-2910

From: Verma, Puneet (puve) [mailto:PVerma@chevron.com]
Sent: Wednesday, January 10, 2018 2:52 PM
To: Schaaff, Lesley <lschaaff@hess.com>; Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>
Subject: RE: Connection

Lesley: Thank you so much for the kind introduction.

Nancy/Charlotte: It is a pleasure to e-meet you. I have head your names numerous times and am pleased our paths are finally crossing.

Chevron has a time sensitive TSCA matter that I would like to bring to your attention. Are you by chance available for a short call sometime today or tomorrow (Thursday)? Apologies for the rush request.

Regards,
Puneet Verma
Chevron – Federal Government Affairs
600 13th Street, NW, Suite 600
Washington, DC 20005
Office: (202) 408-5807

This message may contain confidential information and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any information in this message is strictly prohibited. If you have received this message in error, please notify me immediately at the telephone number indicated below.

From: Schaaff, Lesley [<mailto:lschaaff@hess.com>]

Sent: Wednesday, January 10, 2018 12:15 PM

To: beck.nancy@epa.gov; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Verma, Puneet (puve) <PVerma@chevron.com>

Subject: [****EXTERNAL****] Connection

Hi Nancy and Charlotte. I wanted to introduce you to my good friend and colleague Puneet Verma who is Chevron's DC representative on environmental issues. I met Puneet shortly after I left EPA and he has been an invaluable resource in helping me navigate the industry. I believe Chevron has been working with some of your folks recently, so I thought that I would make the connection. Hope you both are well and having a great 2018 so far!

Lesley

Lesley Schaaff

Senior Manager, Regulatory Affairs

Government & External Affairs

HESS CORPORATION

Office: [202-263-1012](tel:202-263-1012)

Cell: [202-257-0316](tel:202-257-0316)

lschaaff@hess.com

Message

From: Bertrand, Charlotte [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F044D768E05842E1B75321FF6010E1B8-BERTRAND, CHARLOTTE]
Sent: 1/10/2018 11:30:29 PM
To: Schaaff, Lesley [lschaaff@hess.com]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Puneet Verma [PVerma@chevron.com]
Subject: RE: Connection

Hi Lesley –

Thanks for the message. I hope you are having a wonderful 2018 as well!

Best,
Charlotte

Charlotte Bertrand
Acting Principal Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention
Phone Personal Phone / Ex. 6

From: Schaaff, Lesley [mailto:lschaaff@hess.com]
Sent: Wednesday, January 10, 2018 12:15 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Puneet Verma <PVerma@chevron.com>
Subject: Connection

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Lesley

Lesley Schaaff
Senior Manager, Regulatory Affairs
Government & External Affairs
HESS CORPORATION
Office: 202-263-1012
Cell: 202-257-0316
lschaaff@hess.com

Message

From: Gail Charnley [charnley@healthriskstrategies.com]
Sent: 11/30/2017 3:50:24 AM
To: bldgold@pitt.edu; camenzie@exponent.com; elanderson@exponent.com; stevenraiglewis@comcast.net; dourson.michael@gmail.com; abostrom@u.washington.edu; Margaret MacDonell [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user705e15d]; ragnar.lofstedt@kcl.ac.uk; rcantor@brg-expert.com; smkane55@gmail.com; roger.o.mcclellan@att.net; DPaustenbach@chemrisk.com; rwilliams@mercatus.gmu.edu; sdudley@gwu.edu; rbelzer@post.harvard.edu; lrhomborg@gradientcorp.com; ritas50@verizon.net; laughfox5@msn.com; resha.m.putzrath.civ@mail.mil; northworks@mindspring.com; neutralscience@gmail.com; jashatkin@gmail.com; roconnor@nsf.gov; Cristina.McLaughlin@fda.hhs.gov; laylward@summittoxicology.com; fhearl@cdc.gov; bmeek@uottawa.ca; tcoxdenver@aol.com; ortwin.renn@sowi.uni-stuttgart.de; lzeise@oehha.ca.gov; gmgray@gwu.edu; wiener@law.duke.edu; pwilliams@erisksciences.com; Katherine von Stackelberg [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user784e0503]; lcabbott@starpower.net; jpalma-oliveira@fp.ul.pt; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; bbeck@gradientcorp.com; timothypastoor@gmail.com; rreiss@exponent.com; jgoodman@gradientcorp.com; gary.marchant@asu.edu [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2af0a20c5bc54776830e3dcb858b0522-gary.marchant@asu.edu]; r.jeffrey.lewis@exxonmobil.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c38c7ff02df7405b868d54a639586df0-r.jeffrey.lewis@exxonmobil.com]; gpaoli@risksciences.com; jay.f.rouse.ctr@mail.mil; rkasperson@clarku.edu; Jarabek, Annie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8b1de54d48e1429c8129f6499211dbdb-Jarabek, Annie]; khartley@lspgrp.com; tlewandowski@gradientcorp.com; ystevens@asu.edu; fboelter@rhprisk.com; rkashuba@exponent.com
Subject: Tuesday Night Gourmands... 2017 edition

Hello Fellow Gourmands!

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Looking forward to seeing y'all soon!

Cheers,

Gail

Gail Charnley PhD
HealthRisk Strategies LLC
222 11th St. NE
Washington, DC 20002
W: (202) 543-2408
Personal Phone / Ex. 6

charnley@healthriskstrategies.com
www.healthriskstrategies.com

Message

From: Stanley, Michele [mstanley@nssga.org]
Sent: 12/11/2017 4:39:47 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
CC: Ford, Hayley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4748a9029cf74453a20ee8ac9527830c-Ford, Hayle]; Bennett, Tate [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1fa92542f7ca4d01973b18b2f11b9141-Bennett, El]; Bolen, Derrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1ffc58b0468c4deca51a8bad735b7d95-Bolen, Derr]
Subject: RE: Happy Monday!

Great, look forward to hearing from him.

Regards,
Michele

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Monday, December 11, 2017 11:35 AM
To: Stanley, Michele <mstanley@nssga.org>
Cc: Ford, Hayley <ford.hayley@epa.gov>; Bennett, Tate <Bennett.Tate@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>
Subject: Re: Happy Monday!

Michele,
Thanks for reaching out. Please work with Derrick to see if he can find a workable window. I've cc'd him here.
Regards,
Nancy

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

Personal Phone / Ex. 6

Beck.Nancy@epa.gov

On Dec 11, 2017, at 11:28 AM, Stanley, Michele <mstanley@nssga.org> wrote:

Excellent! Thank you Hayley, especially for your quick response.

Deputy Assistant Administrator Beck, please see my request below. If you would like further information, don't hesitate to ask. We would really like to get in to see you before the end of the week, if at all possible. Though we completely realize you are very busy. We'll make ourselves available whenever you have time.

Regards,
Michele

From: Ford, Hayley [mailto:ford.hayley@epa.gov]
Sent: Monday, December 11, 2017 11:20 AM
To: Stanley, Michele <mstanley@nssga.org>
Cc: Beck, Nancy <Beck.Nancy@epa.gov>; Bennett, Tate <Bennett.Tate@epa.gov>
Subject: RE: Happy Monday!

Hi Michele,

Nancy Beck, Deputy Assistant Administrator in the Office of Chemical Safety & Pollution Prevention, would be the best person here. Please send the request her way. Including Tate Bennett too for her awareness.

Thanks!

Hayley Ford

Deputy White House Liaison and Personal Aide to the Administrator
Environmental Protection Agency
ford.hayley@epa.gov

Personal Phone / Ex. 6

From: Stanley, Michele [mailto:mstanley@nssga.org]
Sent: Monday, December 11, 2017 11:10 AM
To: Ford, Hayley <ford.hayley@epa.gov>
Subject: Happy Monday!

Good morning Hayley! Hope this finds you doing well! NSSGA is hoping to schedule a meeting with the EPA on asbestos and the TSCA scoping document that is to be coming out before the end of the year. We want to be sure to weigh in after the Administrator's comments at the hearing last week.

Looking for some guidance. Wondering if a meeting with someone in the Administrator's office would be best or someone over in the chem office would make more sense? or both? And if the chem office is best, who over there should we reach out?

Any help you can provide would be greatly appreciated. Thank you in advance.

Michele Stanley

Personal Phone / Ex. 6

Sent from my iPhone

Message

From: Verma, Puneet (puve) [PVerma@chevron.com]
Sent: 1/10/2018 7:52:10 PM
To: Schaaff, Lesley [lschaaff@hess.com]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Bertrand, Charlotte [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f044d768e05842e1b75321ff6010e1b8-Bertrand, Charlotte]
Subject: RE: Connection

Lesley: Thank you so much for the kind introduction.

Nancy/Charlotte: It is a pleasure to e-meet you. I have head your names numerous times and am pleased our paths are finally crossing.

Chevron has a time sensitive TSCA matter that I would like to bring to your attention. Are you by chance available for a short call sometime today or tomorrow (Thursday)? Apologies for the rush request.

Regards,

Puneet Verma

Chevron – Federal Government Affairs
600 13th Street, NW, Suite 600
Washington, DC 20005
Office: (202) 408-5807

This message may contain confidential information and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any information in this message is strictly prohibited. If you have received this message in error, please notify me immediately at the telephone number indicated below.

From: Schaaff, Lesley [mailto:lschaaff@hess.com]
Sent: Wednesday, January 10, 2018 12:15 PM
To: beck.nancy@epa.gov; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Verma, Puneet (puve) <PVerma@chevron.com>
Subject: [**EXTERNAL**] Connection

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Lesley

Lesley Schaaff
Senior Manager, Regulatory Affairs
Government & External Affairs
HESS CORPORATION
Office: 202-263-1012
Cell: 202-257-0316
lschaaff@hess.com

Message

From: Ford, Hayley [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4748A9029CF74453A20EE8AC9527830C-FORD, HAYLE]
Sent: 12/11/2017 4:20:28 PM
To: Stanley, Michele [mstanley@nssga.org]
CC: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Bennett, Tate [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1fa92542f7ca4d01973b18b2f11b9141-Bennett, E]
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Thanks!

Hayley Ford

Deputy White House Liaison and Personal Aide to the Administrator
Environmental Protection Agency
ford.hayley@epa.gov

Exemption 6

From: Stanley, Michele [mailto:mstanley@nssga.org]
Sent: Monday, December 11, 2017 11:10 AM
To: Ford, Hayley <ford.hayley@epa.gov>
Subject: Happy Monday!

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Any help you can provide would be greatly appreciated. Thank you in advance.

Michele Stanley

Personal Phone / Ex. 6

Sent from my iPhone

Message

From: Barton, Hugh [Hugh.Barton@pfizer.com]
Sent: 10/18/2017 8:31:30 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: catching up

Nancy --

You can call my cell phone Personal Phone / Ex. 6 if you want to talk.

Thanks,
Hugh

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Wednesday, October 18, 2017 1:01 PM
To: Barton, Hugh
Subject: [EXTERNAL] catching up

Hey Hugh,
I hope life is treating you well. Greetings from EPA.

I have a question for you. Do you have any time to chat later today (perhaps after 5pm)?

Thanks,
Nancy

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

Personal Phone / Ex. 6
beck.nancy@epa.gov

Message

From: Minoli, Kevin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C9C0070D651A4625AC20258369F9B050-KMINOLI]
Sent: 11/7/2017 12:41:57 AM
To: Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]
CC: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Reeder, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=aa56f6b0d507483fba530f3abbf6c94f-JREEDER]; OIG Hotline [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d5e42f152e2840aa9d1e8957da4e0b2e-OIG Hotline]; Fugh, Justina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=54afbe2e36d3481c8c52d27ba3979d47-JFUGH]
Subject: Re: Recusal of Dr. Nancy Beck from Proposed TSCA Rules

Dear Ms. Hitchcock-

I write to acknowledge receipt of your email and the letter attached to that email.

Thank you,
Kevin

Kevin S. Minoli
Acting General Counsel
Office of General Counsel
US Environmental Protection Agency
Main Office Line: 202-564-8040

On Nov 6, 2017, at 5:19 PM, Liz Hitchcock- Safer Chemicals <lizhitchcock@saferchemicals.org> wrote:

Kevin Minoli, Acting General Counsel and Ethics Officer

Office of General Counsel

Dear Mr. Minoli:

We are sending the attached letter to request the mandatory recusal of Dr. Nancy Beck, Deputy Assistant Administrator (DAA) for Chemical Safety and Pollution Prevention, from ongoing rulemakings under section 6(a) of TSCA to ban unsafe uses of three widely used chemicals – Trichloroethylene (TCE), Methylene Chloride (MC) and N-Methylpyrrolidone (NMP) (together, the “section 6(a) rulemakings”). Participation in these rulemakings violates federal conflict of interest and impartiality requirements, as illustrated by Dr. Beck’s troubling history as an advocate for chemical companies opposed to the proposed bans and the author of industry comments criticizing the EPA risk assessments on which the bans are based.

In summary, we request that you reconsider the June 8 impartiality determination as applied to the section 6(a) rulemakings or determine that the rulemakings are not subject to the determination. In either event, we ask you to conclude that Dr. Beck is recused from any further participation in the rulemaking process and to inform her of such determination as soon as possible.

Our groups look forward to your early response to this letter. Should you have any questions, please contact Bob Sussman, counsel for Safer Chemicals, Healthy Families, at bobsussman1@comcast.net.

Sincerely yours,

Liz Hitchcock, Government Affairs Director

Safer Chemicals Healthy Families

Eve Gartner, Staff Attorney

Earthjustice

Daniel Rosenberg, Senior Attorney

NRDC

Michael Belliveau, Executive Director

Environmental Health Strategy Center

cc: Dr. Nancy Beck

Ryan Jackson

Justina Fugh

Arthur Elkins (OIG)

Docket ID EPA-HQ-OPPT-2016-0231

Docket ID EPA-HQ-OPPT-2016-0387

Docket ID-EPA-HQ-OPPT-2016-0163

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families
202-794-8755
lizhitchcock@saferchemicals.org
www.saferchemicals.org

<SCHF TSCA 6a recusal letter 11052017.pdf>

Message

From: Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]
Sent: 11/6/2017 10:17:59 PM
To: Minoli, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c9c0070d651a4625ac20258369f9b050-KMINOLI]
CC: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Reeder, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=aa56f6b0d507483fba530f3abbf6c94f-JREEDER]; OIG Hotline [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d5e42f152e2840aa9d1e8957da4e0b2e-OIG Hotline]; Fugh, Justina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=54afbe2e36d3481c8c52d27ba3979d47-JFUGH]
Subject: Recusal of Dr. Nancy Beck from Proposed TSCA Rules
Attachments: SCHF TSCA 6a recusal letter 11052017.pdf

Kevin Minoli, Acting General Counsel and Ethics Officer

Office of General Counsel

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Docket ID EPA-HQ-OPPT-2016-0231

Docket ID EPA-HQ-OPPT-2016-0387

Docket ID-EPA-HQ-OPPT-2016-0163

Liz Hitchcock, Government Affairs Director

Safer Chemicals Healthy Families

202-794-8755

lizhitchcock@saferchemicals.org

www.saferchemicals.org

Kevin Minoli
Acting General Counsel and Ethics Officer
Office of General Counsel
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC 20460

Re: Recusal of Dr. Nancy Beck from Proposed TSCA Rules Banning Particular Uses of Trichloroethylene, Methylene Chloride and N-Methylpyrrolidone

Dear Mr. Minoli:

The undersigned groups are committed to assuring the safety of chemicals used in our homes, workplaces and the many products to which our families and children are exposed each day. We believe that effective implementation of the newly strengthened Toxic Substances Control Act (TSCA) is vital to assessing and reducing exposure to the numerous chemicals that pose known threats to public health and the environment.

We are writing to request the mandatory recusal of Dr. Nancy Beck, Deputy Assistant Administrator (DAA) for Chemical Safety and Pollution Prevention, from ongoing rulemakings under section 6(a) of TSCA to ban unsafe uses of three widely used chemicals – Trichloroethylene (TCE), Methylene Chloride (MC) and N-Methylpyrrolidone (NMP) (together, the “section 6(a) rulemakings”).¹ Participation in these rulemakings violates federal conflict of interest and impartiality requirements, as illustrated by Dr. Beck’s troubling history as an advocate for chemical companies opposed to the proposed bans and the author of industry comments criticizing the EPA risk assessments on which the bans are based.

Dr. Beck Has Already Misused Her EPA Position to Advance Industry Interests in Violation of Ethics Requirements

An October 21 *New York Times* [article](#) -- Why Has the EPA Shifted on Toxic Chemicals? An Industry Insider Helps Call the Shots -- describes at length the role Dr. Beck played as a long-time official of the American Chemistry Council (ACC) and how she has used her current position at EPA to radically alter proposed TSCA regulations to advance the chemical industry’s interests.

For more than five years, Dr. Beck was ACC’s Senior Director, Regulatory Science Policy. A registered lobbying organization, ACC is the principal trade association for large chemical manufacturers and has engaged in extensive advocacy to influence implementation of TSCA. Dr. Beck played a central role in industry advocacy during her employment by ACC. Both before and after the amendment of TSCA, she was the author of numerous comments filed with EPA on TSCA issues, presented ACC’s views on how

¹ Trichloroethylene (TCE); Regulation of Use in Vapor Degreasing under TSCA Section 6(a), 82 Fed. Reg. 7432 (Jan. 19, 2017) – Docket EPA-HQ-OPPT-2016-0387; Trichloroethylene; Regulation of Certain Uses under TSCA § 6(a), 81 Fed. Reg. 91592 (Dec. 16, 2016) – Docket EPA-HQ-OPPT-2016-0163; and Methylene Chloride and N-Methylpyrrolidone; Regulation of Certain Uses under TSCA Section 6(a), 82 Fed. Reg. 7464 (Jan. 19, 2017) – Docket EPA-HQ-OPPT-2016-0231. We request that this letter be added to the dockets for these three chemicals.

the law should be implemented at EPA public meetings and testified in Congress on behalf of ACC on these matters. Through these and other activities, she developed and advocated ACC positions on the critical issues regarding evaluation and regulation of chemicals under TSCA for which she is now responsible as a senior policymaker in the EPA chemicals program.

According to your June 8, 2017 memorandum, when she began work at EPA, Dr. Beck was “advised . . . that [she] cannot participate in any meetings, discussions or decisions that relate to any individual ACC comment.” This advice applied to the proposed rules establishing processes for risk evaluations and prioritization of chemicals (the “framework rules”) that were awaiting finalization at the time of her arrival at EPA. The June 8 memorandum indicates that “[u]ntil now, you have recused yourself from participating personally and substantially in those comments to rulemaking that were offered by ACC.” Yet as recounted in the *New York Times* article, Dr. Beck was the principal decision-maker on EPA’s final rules, directing the staff to make extensive changes from the Agency’s original proposals that mirrored the recommendations in ACC comments that Dr. Beck herself wrote. According to EPA employees interviewed by the *Times*, Dr. Beck “spent her first weeks on the job pressing agency staff to rewrite the standards to reflect, in some cases, word for word, the chemical industry’s proposed changes.” As one EPA senior manager noted, “Nancy was just rewriting the rule herself. And it was a huge change. Everybody was stunned such a substantial change would be made literally in the last week.” Dr. Beck’s work on the rules was substantially complete by June 1, by which time both rules had been submitted to the Office of Management and Budget (OMB) for interagency review.

Even though she had been explicitly advised by you not to “participate in any meetings, discussions or decisions that relate to any individual ACC comment,” Dr. Beck did exactly that in rewriting the draft final rules to incorporate ACC’s recommendations.

The June 8 Impartiality Determination is Contrary to OGE Regulations Because it Fails to Consider the Threats Posed by Dr. Beck to the Integrity of EPA Decision-making

After Dr. Beck oversaw the rewriting of the framework rules to incorporate ACC positions in violation of your ethics instructions, your office issued an “impartiality determination” on June 8 broadly authorizing her “to participate fully in matters of general applicability, including rulemaking, including consideration of any comments that were made by ACC.” This determination did not legitimize Beck’s participation in finalizing the framework rules in violation of your ethics advice but only applied prospectively.

We disagree strongly with the June 8 determination allowing Dr. Beck to consider and base decisions on ACC comments in future TSCA rulemakings. As discussed below, the determination is contrary to the criteria in Office of Government Ethics (OGE) regulations for authorizing such participation notwithstanding an official’s lack of impartiality. We urge you to reconsider the determination so that Dr. Beck does not further impair the integrity of EPA’s decision-making process in connection with other TSCA matters. We are particularly concerned about Dr. Beck’s participation in the section 6(a) rulemakings, which would compound the harm to the Agency’s independence and credibility that has already occurred as a result of her rewriting of the two framework rules to conform to ACC positions.

Under OGE regulations at 5 C.F.R 2635.502(d), where there is a reasonable basis to question an agency's employee's impartiality because of a covered relationship with a party participating in a matter, the ethics official can authorize the employee to participate in the matter if he makes a "determination, in light of all the circumstances, that the interest of the Government in the employee's participation outweighs the concern that a reasonable person might question the integrity of the agency's programs and operations."

This provision requires a careful balancing of interests under the specific circumstances of the matter in question. The OGE regulations enumerate several factors that should be considered as part of this balancing process:

- (1) The nature of the relationship involved;
- (2) The effect that resolution of the matter would have upon the financial interests of the person involved in the relationship;
- (3) The nature and importance of the employee's role in the matter, including the extent to which the employee is called upon to exercise discretion in the matter;
- (4) The sensitivity of the matter;
- (5) The difficulty of reassigning the matter to another employee; and
- (6) Adjustments that may be made in the employee's duties that would reduce or eliminate the likelihood that a reasonable person would question the employee's impartiality.

Several of these factors address the degree to which the employee's participation in the matter would compromise the integrity and impartiality of the agency's decisions and harm its credibility with the public. For example, if the employee's role in the matter is central, she has broad discretion to influence agency decisions, the matter is sensitive and implicates important agency programs, and the employee's actions are highly likely to reflect the views of her former employer, the potential harm to the decision-making process would be substantial and would only be outweighed by a compelling government interest in her participation in the matter.

Your impartiality determination focused on the purported benefits to the Agency of Dr. Beck's "extensive prior expertise with the regulated industry's perspective." Contrary to the OGE regulations, you failed to consider the potential harm to the Agency's decision-making process from the likelihood that Dr. Beck would give preference to the views of her former employer while summarily rejecting those of other key stakeholders, resulting in decisions that are biased and reflect overt favoritism. By ignoring the threat posed by Dr. Beck to the credibility of the Agency's implementation of TSCA, the determination failed to apply the balancing test required by the OGE regulations

Dr. Beck's Involvement in the Section 6(a) Rulemakings is Plainly Unjustified under the OGE Balancing Test and She Should be Recused from Participating in these Rulemakings

An even-handed application of the OGE criteria to the circumstances of the three section 6(a) rulemakings demonstrates that Dr. Beck's further participation poses threats to EPA's integrity and credibility far greater than the limited benefits of her continuing involvement and recusal is necessary.

As the first use of EPA's expanded authority to reduce chemical risks, these rulemakings are precedent setting and vital to the success of the amended toxics law; they also involve serious risks to the millions of workers and consumers who are exposed to the three chemicals. Dr. Beck will have unparalleled opportunities to influence these rulemakings as the highest-ranking political appointee in the chemicals program. Yet ACC filed comments in the three rulemakings that were prepared when Dr. Beck was an ACC employee and likely reflected her input. Dr. Beck also was an author of ACC comments on the risk assessments that formed the basis for the proposed rules and presented ACC's views at public meetings and in Congressional testimony. Her positions were highly critical of Agency's scientific analysis, making it likely that she will adhere to ACC's views and block finalization of the rules. That certain major ACC members will be financially harmed if the rules go forward further underscores her lack of impartiality and the likelihood of industry influence on the outcome of the rulemaking process.

While ignoring these considerations, your determination places great weight on the "benefits" to the government from Dr. Beck's participation in TSCA rulemakings. However, the "benefits" cited mainly involve her ties to the chemical industry and experience as an industry insider. These factors not only underscore Dr. Beck's lack of impartiality but also fail to show that she has unique scientific or policy expertise that makes her irreplaceable within the Agency – a claim that would not hold water given the many experienced and able toxicologists and risk assessors on the EPA career staff. Even Dr. Beck's ability to provide a pipeline to the industry and help explain its positions offers no unique value given the industry's long history of effectively communicating its perspective to EPA through comments, other submissions and in-person meetings.

In sum, the danger of compromising EPA's integrity in these high-profile rulemakings under a new law designed to protect public health greatly outweighs any limited industry-related insight Dr. Beck may be able to contribute to the resolution of the vital scientific and policy issues before the Agency. You should reconsider your impartiality determination as it applies to the section 6(a) rulemakings and instruct Dr. Beck to cease her participation.

At a Minimum, EPA's June 8 Impartiality Determination Should not Apply to the Section 6(a) Rulemakings Because They are Specific Party Matters

Alternatively, you should require Dr. Beck's recusal from the section 6(a) rulemakings on the ground that they fall outside the scope of your impartiality determination. The June 8 determination only authorizes Dr. Beck's participation in matters of general applicability. It emphasizes that she "cannot participate in any specific party matter in which ACC is a party . . . if the circumstances would cause a reasonable person with knowledge of the relevant facts to question [her] impartiality."

At 5 C.F.R. § 2640.102(l), the OGE regulations define "particular matter involving specific parties" as a "judicial or other proceeding . . . or other particular matter involving a specific party or parties. The term typically involves a specific proceeding affecting the legal rights of the parties." As the Trump ethics pledge recognizes, rulemakings can be specific party matters if they target a small number of identified entities and directly impact their legal obligations and economic interests.

This is clearly the case for the section 6(a) rulemakings. As proposed, these rules are limited to three specific chemicals and prohibit their use in particular applications (i.e. vapor degreasing and spot removal for TCE and paint removal for MC and NMP). The chemicals are manufactured by a small and identifiable group of companies who belong to ACC. For example, the two principal US producers of TCE are Axiall Corporation and Olin Corporation; Dow Chemical Company and Occidental Chemical Corporation produce virtually all MC in the US. Finalization of the proposed section 6(a) rules would deprive these companies of markets for their chemicals and result in lost revenue, directly affecting their economic interests and legal obligations. By filing comments on behalf of its affected members, ACC is clearly a “party” to these rulemakings. Since your determination is inapplicable to particular matters impacting Dr. Beck’s former employee ACC and its members, it does not encompass the section 6(a) rulemakings and Dr. Beck’s lack of impartiality should compel her recusal.

In summary, we request that you reconsider the June 8 impartiality determination as applied to the section 6(a) rulemakings or determine that the rulemakings are not subject to the determination. In either event, we ask you to conclude that Dr. Beck is recused from any further participation in the rulemaking process and to inform her of such determination as soon as possible.

Our groups look forward to your early response to this letter. Should you have any questions, please contact Bob Sussman, counsel for Safer Chemicals, Healthy Families, at bobsussman1@comcast.net.

Sincerely yours,

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families

Eve Gartner, Staff Attorney
Earthjustice

Daniel Rosenberg, Senior Attorney
NRDC

Michael Belliveau, Executive Director
Environmental Health Strategy Center

Laurie Valeriano, Executive Director
Toxic-Free Future

cc: Dr. Nancy Beck
Ryan Jackson
Justina Fugh
Arthur Elkins (OIG)

Docket ID EPA-HQ-OPPT-2016-0231
Docket ID EPA-HQ-OPPT-2016-0387
Docket ID-EPA-HQ-OPPT-2016-0163

Message

From: Barton, Hugh [Hugh.Barton@pfizer.com]
Sent: 10/18/2017 6:23:07 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: catching up

Flag: Flag for follow up

Hi Nancy --
I'm doing well. I'm available any time today after 4:30 pm today.
Hugh

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Wednesday, October 18, 2017 1:01 PM
To: Barton, Hugh
Subject: [EXTERNAL] catching up

Hey Hugh,
I hope life is treating you well. Greetings from EPA.

I have a question for you. Do you have any time to chat later today (perhaps after 5pm)?

Thanks,
Nancy

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

Personal Phone / Ex. 6

beck.nancy@epa.gov

Message

From: Dunlap, David [David.Dunlap@kochind.com]
Sent: 10/27/2017 9:30:18 AM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: Re: CDR Inorganic By-Products FACA - FR Notice

Yes, I received her VM. I apologize for not responding immediately but hope to do that today.

DDD

[Get Outlook for iOS](#)

From: Beck, Nancy <Beck.Nancy@epa.gov>
Sent: Thursday, October 26, 2017 10:02:12 PM
To: Dunlap, David
Subject: RE: CDR Inorganic By-Products FACA - FR Notice

Sent by an external sender

Hi David,
Thanks for your message the other day—I appreciate the support.

My understanding is that Tanya has reached out to you to discuss this. Please let me know if you have followup concerns.

Regards,
Nancy

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

Personal Phone / Ex. 6

Beck.Nancy@epa.gov

From: Dunlap, David [mailto:David.Dunlap@kochind.com]
Sent: Thursday, October 12, 2017 8:36 AM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: CDR Inorganic By-Products FACA - FR Notice

Nancy,

In today's FR.

<https://www.gpo.gov/fdsys/pkg/FR-2017-10-12/pdf/2017-22113.pdf>

EPA is providing an opportunity for the public to offer input about approaches that would reduce burden associated with the reporting of inorganic byproducts while maintaining the Agency's ability to receive the information it needs to understand exposure.

Note that the actual LCSA text says the following (emphasis added):

*The Administrator shall enter into a negotiated rulemaking pursuant to subchapter III of chapter 5 of title 5, United States Code, to develop and publish, not later than 3 years after the date of enactment of the Frank R. Lautenberg Chemical Safety for the 21st Century Act, a proposed rule providing for limiting the reporting requirements, under this subsection, **for manufacturers** of any inorganic byproducts, when such byproducts, whether by the byproduct manufacturer or by any other person, are subsequently recycled, reused, or reprocessed.*

This FR notice misrepresents the intent of Congresses request and the FACA's effort. The Agency should clarify.

Regards,

DDD

David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Industries, Inc.

It's never too late to have a happy childhood. - Berkeley Breathed

Message

From: Holm, Stewart [Stewart_Holm@afandpa.org]
Sent: 7/10/2018 9:14:52 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: Sushi
Attachments: ATT00001.txt

Yes. See you there.

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Tuesday, July 10, 2018 5:14 PM
To: Holm, Stewart <Stewart_Holm@afandpa.org>
Subject: RE: Sushi

6:45 ok?

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

Personal Phone / Ex. 6

beck.nancy@epa.gov

From: Holm, Stewart [mailto:Stewart_Holm@afandpa.org]
Sent: Tuesday, July 10, 2018 5:11 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: RE: Sushi

Yes, let's do it.

Thanks,

Stewart

Stewart Holm
Chief Scientist
AMERICAN WOOD COUNCIL
1101 K Street, NW, Suite 700, Washington, DC 20005
Office: 202-463-2709
Email: sholm@awc.org



From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Tuesday, July 10, 2018 5:08 PM
To: Holm, Stewart <Stewart_Holm@afandpa.org>
Subject: RE: Sushi

Yes! Monday the 16th?

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

Personal Phone / Ex. 6
beck.nancy@epa.gov

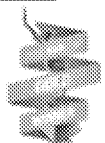
From: Holm, Stewart [mailto:Stewart_Holm@afandpa.org]
Sent: Tuesday, July 10, 2018 4:41 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: Sushi

Hi Nancy,
Well your deadlines are over and the 4th of July is done. It sounds to me that Sushi is in order. I'm open all next week. Hope one of those days works for you.

Thanks,

Stewart

Stewart Holm
Chief Scientist
AMERICAN WOOD COUNCIL
1101 K Street, NW, Suite 700, Washington, DC 20005
Office: 202-463-2709
Email: sholm@awc.org



The content image001.jpg of type has been blocked.

Message

From: Holm, Stewart [Stewart_Holm@afandpa.org]
Sent: 7/10/2018 9:10:33 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: Sushi

Yes, let's do it.

Thanks,

Stewart

Stewart Holm

Chief Scientist
AMERICAN WOOD COUNCIL
1101 K Street, NW, Suite 700, Washington, DC 20005
Office: 202-463-2709
Email: sholm@awc.org



From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Tuesday, July 10, 2018 5:08 PM
To: Holm, Stewart <Stewart_Holm@afandpa.org>
Subject: RE: Sushi

Yes! Monday the 16th?

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

Personal Phone / Ex. 6

beck.nancy@epa.gov

From: Holm, Stewart [mailto:Stewart_Holm@afandpa.org]
Sent: Tuesday, July 10, 2018 4:41 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: Sushi

Hi Nancy,

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Thanks,

Stewart

Stewart Holm

Chief Scientist

AMERICAN WOOD COUNCIL

1101 K Street, NW, Suite 700, Washington, DC 20005

Office: 202-463-2709

Email: sholm@awc.org



Message

From: Holm, Stewart [Stewart_Holm@afandpa.org]
Sent: 7/10/2018 8:41:26 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: Sushi
Attachments: ATT00001.txt

Hi Nancy,
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Thanks,

Stewart

Stewart Holm

Chief Scientist
AMERICAN WOOD COUNCIL
1101 K Street, NW, Suite 700, Washington, DC 20005
Office: 202-463-2709
Email: sholm@awc.org



The content image001.jpg of type has been blocked.

Message

From: Morris, Jeff [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55C34872E6EA40CAB78BE910AEC63321-MORRIS, JEFF]
Sent: 9/14/2017 1:10:59 PM
To: Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]
CC: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Mclean, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=869a9152d655420594d8f94a966b8892-KMCLEAN]; Grant, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ec6104b72cab42ba9b1e1da67d4288ae-Grant, Brian]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]
Subject: Re: Revisions to the CDR reporting rule

Dear Liz,

Thank you very much for the letter on CDR. We will review the letter and contact Bob Sussman if we believe follow-up discussion would be useful.

All the best,

Jeff

Sent from my iPad

On Sep 6, 2017, at 3:51 PM, Liz Hitchcock- Safer Chemicals <lizhitchcock@saferchemicals.org> wrote:

Dear Dr. Morris:

The attached letter is submitted by Safer Chemicals, Health Families (“SCHF”), Earthjustice, Natural Resources Defense Council (“NRDC”), Environmental Health Strategy Center, and Toxic-Free Future. These organizations are committed to enhancing the safety of chemicals used in homes, workplaces and products and strongly support effective and health-protective implementation of the revised Toxic Substances Control Act (“TSCA”) enacted last year by Congress.

According to the Trump Administration’s recently released Unified Agenda of Regulatory and Deregulatory Actions, the Environmental Protection Agency (“EPA”) is planning to revise the TSCA Chemical Data Reporting (“CDR”) rule (40 CFR Part 711) in May of 2018. Your staff recently reached out to our groups to learn more about our views on CDR reporting. The attached letter underscores and amplifies the key concerns and recommendations we conveyed during that discussion.

We would be happy to answer questions or provide additional information. For this purpose, please contact Bob Sussman, SCHF counsel, at bobsussman1@comcast.net.

Best regards,

Liz Hitchcock, Government Affairs Director

Safer Chemicals Healthy Families
202-794-8755
lizhitchcock@saferchemicals.org
www.saferchemicals.org

<SCHF re CDR Data Revisions 962017.pdf>

Message

From: Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]
Sent: 10/17/2017 7:45:18 PM
To: Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]
CC: Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]; Henry, Tala [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8bfc0a617a4a43baa8856541c70622be-THENRY02]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Schweer, Greg [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4fe412a2024b4f548eeb02e7e931f484-GSchweer]; Blunck, Christopher [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=827cd31fd0484c319e5a2e7511f65461-Blunck, Christopher]
Subject: Concerns about PMN program
Attachments: SCHF PMN letter(final).pdf

Dear Dr. Morris:

Thank you for meeting with several of us on September 18 to discuss EPA's premanufacture notification (PMN) program for new chemicals under section 5 of the Toxic Substances Control Act (TSCA). We felt the meeting was constructive and informative but came away with serious concerns about the "principles" for PMN review announced in EPA's August 7 press release. The attached letter underscore these concerns and offers recommendations for greater transparency and public involvement in the PMN program.

We would be happy to answer questions or provide additional information. For this purpose, please contact Bob Sussman, SCHF counsel, at bobsussman1@comcast.net.

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families
202-794-8755
lizhitchcock@saferchemicals.org
www.saferchemicals.org

October 16, 2017

Dr. Jeff Morris
Acting Director, Office of Pollution Prevention and Toxics
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC 20460

Re: Concerns about PMN Program

Dear Dr. Morris:

Thank you for meeting with several of us on September 18 to discuss EPA's premanufacture notification (PMN) program for new chemicals under section 5 of the Toxic Substances Control Act (TSCA). We felt the meeting was constructive and informative but came away with serious concerns about the "principles" for PMN review announced in EPA's August 7 press release. We are writing to underscore these concerns and to offer recommendations for greater transparency and public involvement in the PMN program.

The recently enacted Lautenberg Chemical Safety Act (LCSA) strengthens the PMN program and expands EPA's authority to restrict potentially unsafe new chemicals. We support these improvements and were pleased that EPA initially revamped the PMN review process to put in place the stronger protections required by Congress. However, the chemical industry has strongly opposed these enhanced protections and lobbied hard to reinstate the status quo before LCSA took effect. The August 7 press release provides worrisome evidence that EPA is backtracking from its strong approach to implementation in response to this industry pressure. Because of our strong legal and policy concerns about the directions announced in the press release, we request that you respond in writing to the issues discussed below.

Reducing the Backlog. Industry has taken EPA to task for creating a "backlog" of PMNs on which the Agency has not completed review. At our meeting, you indicated that EPA has reduced the backlog by temporarily transferring staff to the PMN program from elsewhere in the Agency. Since these additional resources likely will be unavailable in the future, EPA may be pressed by industry to achieve efficiencies by cutting corners on the rigor of PMN reviews. We would strongly oppose any approach that compromises the quality and thoroughness of the evaluation of individual PMNs in order to accelerate the review process. A truncated review process that gives short shrift to potential risks will only serve to save industry time and money at the expense of public health.

As you confirmed at the meeting, a major contributor to inefficiencies in the PMN program is industry itself, which has placed additional burdens on the EPA staff by filing PMNs that are incomplete or contain incorrect information and by failing to anticipate EPA concerns in their initial PMNs, necessitating supplemental submissions in response to staff information requests. These practices result in multiple cycles of review for individual PMNs and the expenditure of limited staff resources on extensive give-and-take with submitters. It is alarming that the August 7 press release seems to be condoning the practice of amended submissions when the Agency's goal should be to keep these submissions to a minimum by encouraging filing of robust and accurate PMNs at the start of the review process. While we were pleased that you supported this goal at our meeting, we request that you

describe the specific steps EPA will take to intensify its efforts to enhance the quality and responsiveness of industry submissions.

Shift to SNURs for Restricting Future Uses. The August 7 press release indicates that EPA no longer intends to issue section 5(e) orders “[w]here EPA has concerns with reasonably foreseeable uses, but not with the intended uses as described in a PMN or LVE application.” Instead, the Agency plans to address these concerns solely through significant new use rules (SNURs) under section 5(a)(2).

We believe this change in approach is contrary to TSCA. EPA’s safety determinations and regulatory actions under section 5 are expressly required to address risks presented by a new chemical under its “conditions of use.” This term is defined under section 3(4) of TSCA to include the circumstances under which a chemical is “*reasonably foreseen* to be manufactured, processed, distributed in commerce, or disposed of” (emphasis added). If EPA identifies a reasonably foreseeable use raising concerns that meet the criteria for action under section 5(e), the law states that the Agency “shall” issue an order under that provision, whether the use is intended by the PMN submitter or not. EPA must then consider extending the order’s protections to other manufacturers and processors under a SNUR, but the role of the SNUR is to supplement the order, not substitute for it.

The obvious benefit of a section 5(e) order in these circumstances is that it prevents the manufacture of the new chemical for the reasonably foreseeable use except under the restrictions EPA deems necessary to assure that the use is safe. In theory, a SNUR could also perform this function but it would need to be finalized by the end of the PMN review period so that the use does not fall through the cracks and the submitter and other firms are unable to commercialize it except under the SNUR restrictions.

We appreciate your desire to complete SNUR rulemakings on this expedited schedule, but the rulemaking process takes time and resources. For EPA to fast-track SNURs so they are promulgated within 90 days of PMN submission (or at most 180-days if the review period is extended) would be a daunting and probably impossible task. Indeed, our research has failed to disclose a single SNUR that EPA has finalized on substances subject to section 5(e) orders issued after LCSA took effect. The lack of SNURs several months after these orders were issued is contrary to the 90-day deadline for initiating rulemaking in section 5(f)(4) of TSCA¹ and calls into serious question EPA’s ability to expedite SNURs on non-5(e) chemicals. For this reason, it would be not only unlawful but dangerous to public health and the environment for EPA to relinquish the leverage it has under section 5(e) to restrict future uses of concern before the start of production based on the uncertain prospect that, at some point in the future, they will be subject to SNURs.

We request that you explain why EPA believes it has authority to forego issuing section 5(e) orders on chemicals with reasonably foreseeable future uses that may present an unreasonable risk or otherwise meet the criteria for action under LCSA. We further request that you describe the steps you intend to take to assure that SNURs on these chemicals are finalized by the end of the PMN review period.

Requiring Evidence that Future Uses are “Probable.” The August 7 press release indicates that future uses will be restricted if they are “not only possible but, over time under proper conditions, probable.”

¹ Under section 5(f)(4), within 90 days of issuing an order under section 5(e), EPA must decide whether to promulgate a SNUR for a substance regulated under that order and either initiate the rulemaking process or explain why a SNUR is not needed. These deadlines do not apply to SNURs on non-5(e) chemicals and, as a result, EPA is under no obligation or schedule to issue such SNURs.

This sets an unjustifiably high bar for limiting future uses. To satisfy the “reasonably foreseen” standard in the law, there must be a plausible basis, supported by the characteristics of the new chemical and similar substances, to conclude that a chemical could reasonably be used for a particular purpose. A “probability” test, however, goes further, requiring EPA to demonstrate a likelihood that the use will occur. Such a showing would be difficult to make, given the many market uncertainties at the time a new chemical is initially commercialized, and in practice would discourage restrictions on reasonably foreseeable future uses.

Once EPA allows production of a new chemical to begin without a section 5(e) order or SNUR, it loses its ability to address risks to health and the environment except through the lengthy and resource-intensive risk evaluation and management process in section 6. Thus, it is in the public interest for EPA to maintain control over future uses of new chemicals to the full extent required under the law. If the new use does materialize, the restrictions in place under section 5(e) and the SNUR will provide assurance that it will be conducted safely. If the use never materializes, there would be no downside other than the upfront work of developing the section 5(e) order and SNUR.

Testing Based on Insufficient Data. The August 7 press release emphasizes that the purpose of testing under section 5(e) is “to reduce uncertainty in regard to risk” but then suggests that such testing is mainly to “address risk concerns that gave rise to a finding of ‘may present an unreasonable risk’” under section 5(a)(3)(B)(ii). In fact, testing is also required whenever the available information is “insufficient to permit a reasoned evaluation of the health and environmental effects” of the new chemical under section 5(a)(3)(A). EPA’s ability to require testing in the absence of adequate data, even if there is no direct evidence of risk, is a critical advance over the original TSCA and an important element of the strengthened PMN program. Further explanation of how EPA is using this authority is needed, including EPA’s criteria for assessing the sufficiency of existing information, the number of orders it has issued to fill data gaps and the scope of the testing required.

Enhancing Transparency. The August 7 press release recognizes that “EPA needs to be more transparent in how it makes decisions on new chemicals” and commits the Agency to releasing and seeking public comment on documents that provide “more certainty and clarity” regarding the basis for new chemical determinations later this fall. We strongly support greater transparency. However, EPA should not focus simply on educating industry about the PMN process but should also seek to inform the public about EPA’s efforts to protect health and the environment under section 5 and provide a basis for judging EPA’s success in meeting the goals of the new law.

Right now, obtaining information on EPA’s decisions on individual PMNs requires a complex, multi-step search of the Agency’s Website and even with sustained effort, a meaningful picture of the Agency’s actions is often unavailable. While section 5(g) requires EPA to publish a statement of its findings when it has concluded that a new chemical is not likely to present an unreasonable risk of injury under section 5(a)(3)(C), it is equally important for the general public and impacted communities to understand the nature and basis of EPA’s actions to restrict chemicals because they present or may present an unreasonable risk, lack sufficient information for a reasoned evaluation of risk, or have the potential for substantial production and exposure or release. To provide this transparency, EPA should expeditiously post summary documents describing the rationale and supporting information for its safety determinations on such chemicals and the requirements it has imposed under sections 5(e) or (f).

Also critical for public oversight is an in-depth “trends analysis” for the PMN program as a whole. As we discussed at the meeting, this analysis should dig below the summary statistics that EPA now makes available and provide a more detailed breakdown of the number of PMNs falling into EPA’s categories of concern, the types of uses identified in PMNs or by the Agency, the nature of testing requirements imposed, the amount and type of test data submitted, and the restrictions on exposure and release required. This analysis should be made available later this fall, when EPA provides additional information about its implementation of section 5 and seeks public comment.

We request that, in your response to this letter, you indicate whether EPA will undertake these steps to enhance the transparency of the PMN program.

CBI Substantiation. A top priority of the TSCA amendments was to reform the process for CBI protection by boosting transparency and imposing greater rigor and accountability on CBI claimants and EPA staff. Reflecting these goals, section 14(c)(3) requires substantiation of all CBI claims at the time of information submittal with the exception of a few narrow information categories. After a delay in interpreting this new requirement, on January 19, 2017, EPA announced that the substantiation provisions in amended section 14 were self-executing and should be implemented by all information submitters starting on March 20, 2017. It also required industry to substantiate CBI claims for earlier submissions by September 18, 2017 (recently extended by one month).

Although EPA’s substantiation policies apply to the PMN program, we have been unable to determine whether PMNs submitted under the new law include CBI substantiation and whether the Agency is taking steps to assure compliance with its January 19 directives. We urge you to clarify this situation as soon as possible. We would be very troubled if PMNs – which are replete with CBI claims – are not adhering to the substantiation requirements.

In summary, we have several concerns about recent policy changes in the PMN program that we believe are unlawful or put protection of health and the environment at risk. We request that you provide a written response to this letter explaining how you plan to address these concerns and assure a strong and effective new chemical review process under LCSEA.

We would be happy to answer questions or provide additional information. For this purpose, please contact Bob Sussman, SCHF counsel, at bobsussman1@comcast.net.

Sincerely yours,

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families

Patrick MacRoy, Deputy Director
Environmental Health Strategy Center

Eve Gartner, Staff Attorney
Earthjustice

Daniel Rosenberg, Senior Attorney
Natural Resources Defense Council

cc:

Maria Doa
Dr. Tala Henry
Chris Blunck
Greg Schweer
Nancy Beck

Message

From: Dunlap, David [David.Dunlap@kochind.com]
Sent: 10/12/2017 12:35:39 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: CDR Inorganic By-Products FACA - FR Notice

Nancy,

In today's FR.

<https://www.gpo.gov/fdsys/pkg/FR-2017-10-12/pdf/2017-22113.pdf>

EPA is providing an opportunity for the public to offer input about approaches that would reduce burden associated with the reporting of inorganic byproducts while maintaining the Agency's ability to receive the information it needs to understand exposure.

Note that the actual LCSA text says the following (emphasis added):

*The Administrator shall enter into a negotiated rulemaking pursuant to subchapter III of chapter 5 of title 5, United States Code, to develop and publish, not later than 3 years after the date of enactment of the Frank R. Lautenberg Chemical Safety for the 21st Century Act, a proposed rule providing for limiting the reporting requirements, under this subsection, **for manufacturers** of any inorganic byproducts, when such byproducts, whether by the byproduct manufacturer or by any other person, are subsequently recycled, reused, or reprocessed.*

This FR notice misrepresents the intent of Congresses request and the FACA's effort. The Agency should clarify.

Regards,

DDD

David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Industries, Inc.

It's never too late to have a happy childhood. - Berkeley Breathed

Message

From: Morris, Jeff [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55C34872E6EA40CAB78BE910AEC63321-MORRIS, JEFF]
Sent: 10/24/2017 9:05:17 PM
To: Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]
CC: Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]; Henry, Tala [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8bfc0a617a4a43baa8856541c70622be-THENRY02]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Schweer, Greg [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4fe412a2024b4f548eeb02e7e931f484-GSchweer]; Blunck, Christopher [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=827cd31fd0484c319e5a2e7511f65461-Blunck, Christopher]
Subject: RE: Concerns about PMN program

Dear Ms. Hitchcock,

Thank you for your letter. After its review, we will follow up through Bob Sussman if we have any questions.

Best regards,

Jeff

From: Liz Hitchcock- Safer Chemicals [mailto:lizhitchcock@saferchemicals.org]
Sent: Tuesday, October 17, 2017 3:45 PM
To: Morris, Jeff <Morris.Jeff@epa.gov>
Cc: Doa, Maria <Doa.Maria@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Schweer, Greg <Schweer.Greg@epa.gov>; Blunck, Christopher <Blunck.Chris@epa.gov>
Subject: Concerns about PMN program

Dear Dr. Morris:

Thank you for meeting with several of us on September 18 to discuss EPA's premanufacture notification (PMN) program for new chemicals under section 5 of the Toxic Substances Control Act (TSCA). We felt the meeting was constructive and informative but came away with serious concerns about the "principles" for PMN review announced in EPA's August 7 press release. The attached letter underscore these concerns and offers recommendations for greater transparency and public involvement in the PMN program.

We would be happy to answer questions or provide additional information. For this purpose, please contact Bob Sussman, SCHF counsel, at bobsussman1@comcast.net.

Liz Hitchcock, Government Affairs Director
Safer Chemicals Healthy Families
202-794-8755
lizhitchcock@saferchemicals.org
www.saferchemicals.org

Message

From: Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]
Sent: 7/10/2018 2:36:03 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
CC: Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]
Subject: Designation of "mercury and mercury compounds" as a high priority substance
Attachments: SCHF Mercury High Priority Designation Support Letter 7_2018.pdf

Dear Ms. Beck:

The attached letter signed by thirty state, local and national organizations, urges the Environmental Protection Agency (EPA) to include "mercury and mercury compounds" in the next round of high priority chemical designations required under Section 6(b)(2)(B) of TSCA. This designation will enable EPA to further reduce mercury use in products and processes, consistent with the obligations of the United States government (USG) under the Minamata Convention on Mercury, and as otherwise needed to protect human health the environment.

Thank you for your attention to this matter. If you have any questions or would like to discuss this further, please feel free to contact David Lennett (dlennett@nrdc.org).

Best regards,

Liz Hitchcock, Acting Director
Safer Chemicals, Healthy Families
lizhitchcock@saferchemicals.org
202-794-8755

July 2, 2018

Dr. Nancy Beck
Deputy Assistant Administrator, OCSPP
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC 20460-0001

Re: Designation of “mercury and mercury compounds” as a high priority substance

Dear Ms. Beck:

We write to urge the Environmental Protection Agency (EPA) to include “mercury and mercury compounds” in the next round of high priority chemical designations required under Section 6(b)(2)(B) of TSCA. This designation will enable EPA to further reduce mercury use in products and processes, consistent with the obligations of the United States government (USG) under the Minamata Convention on Mercury, and as otherwise needed to protect human health the environment.

The United States is a Party to the Minamata Convention on Mercury. The Convention entered into force on August 16, 2017. Under the Convention, the United States has obligations related to reducing mercury use in product manufacturing, and in industrial processes. For example, under Article 4 of the Convention, the USG must reduce mercury use in the manufacture of switches and relays, and under Article 5 of the Convention the USG must take measures to phase out mercury use in the production of polyurethane “as fast as possible”. Additional USG obligations include discouraging new mercury product types, discouraging new uses of mercury in manufacturing processes, and reporting obligations related to each of these control measures.

Significantly, as part of the rulemaking governing the TSCA chemical prioritization process, the Agency indicated -

“[i]t should take into consideration relevant international actions, such as multilateral environmental agreements, global and regional partnerships, and bilateral or international commitments. EPA is of the view that it should give particular attention to those chemicals for which the United States has accepted international obligations and to chemicals for which significant global or regional action has been taken or is expected to be taken.”

Moreover, it is hard to conceive of substances better situated for prioritization than mercury and mercury compounds. Mercury can cause irreversible damage to the developing brain. As EPA indicated in the 2014 Workplan Update, the chemicals are already “well characterized”. And under TSCA as revised, a separate and detailed supply, use, and trade reporting system is currently in progress. Proposed rules to implement this system were already issued on October 26, 2017, and final rules are mandated by statute on or before June 22, 2018. These rules will require the electronic submission of comprehensive data by July 1, 2019. Accordingly, approximately six months before EPA’s final prioritization decisions are made (by the end of December 2019), the Agency will have an extraordinarily robust data base for identifying conditions of use and potential exposure scenarios. Based upon these data, the Agency is

required to issue an inventory of mercury supply, trade, and use by April 1, 2020, which must include recommended actions to achieve further reductions in mercury use.

The federal government has enacted a mercury export ban, mandated the construction of a facility to permanently sequester mercury in lieu of placing the mercury in commerce, restricted mercury use in the production of batteries and certain other product uses, and records/publicizes mercury fish consumption advisories. Prioritizing mercury for TSCA action would be consistent with these federal policies to reduce mercury supply, uses and exposures. State support for the high priority substance designation is reflected in the recent April 17, 2018 letter from the Environmental Council of States (ECOS), and the myriad of state laws and regulations restricting mercury use in products.

If you have any questions or would like to discuss this further, please feel free to contact David Lennett (dlennett@nrdc.org).

Thank you for your attention to this matter.

Sincerely,

Alaska Community Action on Toxics

Alliance of Nurses for Healthy Environments

Asbestos Disease Awareness Organization

Breast Cancer Prevention Partners

Center for Environmental Health

Clean and Healthy New York

Clean Production Action

Clean Water Action

Coalition for a Safe and Healthy Connecticut

Earthjustice

Ecology Center

Green Newton

Health Care Without Harm

Healthy Babies Bright Futures

Healthy Legacy Coalition

Healthy Mothers Healthy Babies Coalition of Massachusetts

League of Conservation Voters

Learning Disabilities Association of America

Learning Disabilities Association of Illinois

Learning Disabilities Association of Maine

Massachusetts Breast Cancer Coalition

Natural Resources Defense Council

Oregon Environmental Council

Safer Chemicals Healthy Families

Science and Environmental Health Network

Texas Campaign for the Environment

Toxic-Free Future

Vermont Public Interest Research Group

WE ACT for Environmental Justice

Women's Voices for the Earth

Message

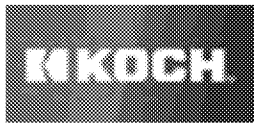
From: Dunlap, David [David.Dunlap@kochps.com]
Sent: 7/20/2017 7:30:50 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: TSCA - Pre-Prioritization Process

Nancy,

Is there still an opportunity to speak to folks about how the Agency intends to do pre-prioritization?

Can you shed any light on the Agency's current thinking?

DDD



David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Industries, Inc.
☎ 202.879.8511 | ✉ david.dunlap@kochps.com
KochInd.com | WeAreKoch.com

If you think its hard to meet people, try picking up the wrong golf ball – Jack Lemon

Message

From: Dunlap, David [David.Dunlap@kochps.com]
Sent: 7/17/2017 11:34:13 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group
(FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: Lunch

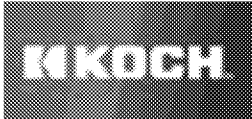
Elephant & Castle?

Message

From: Dunlap, David [David.Dunlap@kochps.com]
Sent: 7/6/2017 12:22:58 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: Government Hiring Freeze

The freeze has been lifted, correct? EPA, especially OCSPP, can hire folks?

DDD



David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Companies Public Sector
☎ 202.879.8511 | ✉ david.dunlap@kochps.com
KOCHind.com | WeAreKOCH.com

If you think its hard to meet people, try picking up the wrong golf ball – Jack Lemon

Message

From: Dunlap, David [David.Dunlap@kochps.com]
Sent: 6/29/2017 8:58:42 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: Unique Identifiers Stakeholder Process

Thanks. Travel safe.

DDD

David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Companies Public Sector

Culture eats strategy for breakfast – Peter Drucker

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Thursday, June 29, 2017 4:56 PM
To: Dunlap, David <David.Dunlap@kochps.com>
Subject: RE: Unique Identifiers Stakeholder Process

Sent by an external sender

Don't quote me but this is what I'm hearing:

The requirement to assign unique IDs to chemicals with approved CBI claims for chemical identity is immediate in section 14. There is also a deadline in TSCA to "annually publish" a list of unique IDs, which we've interpreted to mean no later than December 2017 (i.e., the calendar year following the year of TSCA enactment). There is no "final" rule per se; the FRN and public meeting were both just solicitation of public comments on possible approaches.

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

Personal Phone / Ex. 6

beck.nancy@epa.gov

From: Dunlap, David [mailto:David.Dunlap@kochps.com]
Sent: Thursday, June 29, 2017 11:38 AM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: RE: Unique Identifiers Stakeholder Process

One quick question – what is your timeline on this issue? When would you like to go final?

DDD

David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Companies Public Sector

Culture eats strategy for breakfast – Peter Drucker

From: Beck, Nancy [<mailto:Beck.Nancy@epa.gov>]
Sent: Thursday, June 29, 2017 11:36 AM
To: Dunlap, David <David.Dunlap@kochps.com>
Subject: RE: Unique Identifiers Stakeholder Process

Sent by an external sender

Back to back meetings all day, getting on a plane 8am tomorrow. Back Wednesday.
Sorry.

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

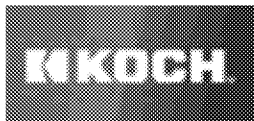
Personal Phone / Ex. 6

beck.nancy@epa.gov

From: Dunlap, David [<mailto:David.Dunlap@kochps.com>]
Sent: Thursday, June 29, 2017 11:29 AM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: Unique Identifiers Stakeholder Process

Do you have 10 minutes to discuss today or tomorrow?

DDD



David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Companies Public Sector
☎ 202.879.8511 | ✉ david.dunlap@kochps.com
KOCHind.com | WeAreKOCH.com

If you think its hard to meet people, try picking up the wrong golf ball – Jack Lemon

Message

From: Dunlap, David [David.Dunlap@kochps.com]
Sent: 8/9/2017 6:55:12 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: CDR Inorganic By-Products Reg Neg - Aug 16-17 Meeting

Now I understand. Just a little slow today.

Maybe Monday? 15 minutes?

I love my garlic!

DDD

David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Industries, Inc.

It's never too late to have a happy childhood. - Berkeley Breathed

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Wednesday, August 09, 2017 2:53 PM
To: Dunlap, David <David.Dunlap@kochps.com>
Subject: Re: CDR Inorganic By-Products Reg Neg - Aug 16-17 Meeting

Sent by an external sender

I will be at the meeting. I'm in California now.

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

Personal Phone / Ex. 6

Beck.Nancy@epa.gov

On Aug 9, 2017, at 11:41 AM, Dunlap, David <David.Dunlap@kochps.com> wrote:

Gilroy, CA – Garlic capital of the world, baby! Been there. Lots of bleach/chlorine used in the vegetable/food processing industry, which of course it close to where the food is grown.

So, you won't be able to make the FACA meeting on Aug 16-17?

DDD

David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Industries, Inc.

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From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Wednesday, August 09, 2017 2:36 PM

To: Dunlap, David <David.Dunlap@kochps.com>
Subject: Re: CDR Inorganic By-Products Reg Neg - Aug 16-17 Meeting

Sent by an external sender

I'm in California all week doing crop tours.

<image001.jpg>

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

Personal Phone / Ex. 6

Beck.Nancy@epa.gov

On Aug 9, 2017, at 10:51 AM, Dunlap, David <David.Dunlap@kochps.com> wrote:

Do you have 15 minutes to discuss?

Besides the first morning, I suggest you also consider attendance on second morning.

DDD

David D. Dunlap | Director, Environmental Regulatory Affairs
Koch Industries, Inc.

It's never too late to have a happy childhood. - Berkeley Breathed

From: Beck, Nancy [<mailto:Beck.Nancy@epa.gov>]
Sent: Wednesday, August 09, 2017 10:01 AM
To: Dunlap, David <David.Dunlap@kochps.com>
Subject: Re: CDR Inorganic By-Products Reg Neg - Aug 16-17 Meeting

Sent by an external sender

Yes. I intend to the first morning. Will try for longer if needed.

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

Personal Phone / Ex. 6

Beck.Nancy@epa.gov

On Aug 9, 2017, at 6:43 AM, Dunlap, David <David.Dunlap@kochps.com> wrote:

Any chance you can drop in on this meeting next week?

DDD

Message

From: Dunlap, David [David.Dunlap@kochps.com]
Sent: 8/9/2017 6:40:13 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: CDR Inorganic By-Products Reg Neg - Aug 16-17 Meeting

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To: Dunlap, David <David.Dunlap@kochps.com>
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Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

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Koch Industries, Inc.

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From: Beck, Nancy [<mailto:Beck.Nancy@epa.gov>]
Sent: Wednesday, August 09, 2017 10:01 AM
To: Dunlap, David <David.Dunlap@kochps.com>
Subject: Re: CDR Inorganic By-Products Reg Neg - Aug 16-17 Meeting

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Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

Personal Phone / Ex. 6

Beck.Nancy@epa.gov

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