

Message

From: Jamie Conrad [jamie@conradcounsel.com]
Sent: 2/2/2018 7:47:47 PM
To: David Wawer [DavidWawer@CPMA.Com]
CC: Bolen, Brittany [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=31e872a691114372b5a6a88482a66e48-Bolen, Brit]; Robert Helminiak [helminiakr@socma.com]; Tatiana Letcheva [TatianaLetcheva@CPMA.Com]
Subject: Re: Question: 2016 EPA Request to NTP to Conduct Toxicological Study of PCB-11
Attachments: James W. Conrad Jr..vcf

Flag: Follow up

Good idea. Good luck!

-- Jamie

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On Feb 2, 2018, at 2:30 PM, David Wawer <DavidWawer@CPMA.Com> wrote:

Dear Brittany,

During the previous Administration (late 2015 or early 2016), a request originated from unknown career staff at EPA to the NTP for a study of PCB-11 (see below). The NTP webpage incorrectly characterized the known uses, however - color pigment manufacturers do not intentionally use PCB 11 to produce color pigments. My efforts to communicate with a responsible person at NTP, to correct their mischaracterization of known uses, went into a "black hole". We also had several conversations with EPA staff in the Program Assessment & Outreach Branch of OPPT in 2016 to better understand the genesis of the original request from EPA to NTP. As recently as last year, OPPT staff could not provide copies of any official or unofficial communication between EPA staff and NTP requesting the PCB-11 study. Such communication would have outlined the rationale for requesting the study in the first place.

It's now early 2018, with no information forthcoming from NTP staff, and still no understanding why this study was requested by EPA career staff in the first place.

I realize your office has been dealing with mega-issues, and quite successfully, during the first year of the Trump Administration, and that this "small NTP project" is probably not on your radar screen. We believe there are very pertinent questions surrounding this project for which stakeholders/taxpayers should be informed.

Why was this project initiated in the first place in light of the fact there was no public threat to human health & the environment?

How many taxpayer dollars have been spent to date?

How many NTP staff resources have been assigned to this project?

When is it going to end, what is going to be the final cost to taxpayers, and what does one expect to gain in terms of public policy as a result of this activity?

In your leadership role at EPA, we request that you communicate with OPPT officials and NTP officials, in an effort to provide greater public transparency on this three-year old agency activity?

CPMA representatives would be glad to meet with you to provide further background information and answer any related questions you may have.

Thank you for your consideration in this matter.

Dave

Testing Status of 3,3'-Dichlorobiphenyl 15035

CASRN: 2050-67-1

Formula: C12-H8-Cl2

Synonyms/Common Names

- PCB 11

Known Uses

Yellow pigment

Chemical Properties

Toxicity Effects (HSDB)

Genetic Toxicology

- Salmonella (G15035) On Test
 - Lot/Batch: 26692

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