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**From:** Beck, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=168ECB5184AC44DE95A913297F353745-BECK, NANCY]  
**Sent:** 12/15/2017 12:31:27 PM  
**To:** Dr. William Irwin, DABT, ERT [Ex. 6]  
**CC:** Irwin, William [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=42ee3c23d190402e8d315f22ba39e4e8-Irwin, William]  
**Subject:** Re: "Defined Formats" Proposal

Thanks Bill.

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Nancy B. Beck, Ph.D., DABT  
Deputy Assistant Administrator, OCSPP  
P: 202-564-1273  
[Ex. 6]  
[Beck.Nancy@epa.gov](mailto:Beck.Nancy@epa.gov)

On Dec 14, 2017, at 10:34 PM, Dr. William Irwin, DABT, ERT [Ex. 6] wrote:

Hi Nancy,

I am attaching a money-saving proposal for OPP for your consideration, which was written by Dr. John Doherty, DABT and myself. I have supported Dr. Doherty on this proposal since 2011. John was furious at all the hysteria mentioned in the NYT article and in the newspapers on chlorpyrifos, his project for years. John is an excellent toxicologist with 40 years of experience, one of the very best from OPP. Our honest intent for the proposal was based on that it was the duty of all federal employees to increase efficiencies and to save the taxpayers money. John was shocked that he was faced with intimidation in HED on this idea, even though it would save OPP \$ millions. He has recently become convinced that there is a conflict of interest by those whom originated from CROs to support the idea.

John recently made a comment that he was considering sending the proposal to the IG for consideration. I don't know whether he was joking or not. I can't control John's actions. But to be fair to you, I thought that you should be sent our proposal in case he does. All that I can say is that the pharma industry from where I originated is far more efficient than the pesticides office and our ideas would have increased productivity in OPP.

I hope that all is well there. Thank you for your time and consideration.

Cheers,

Dr. William Irwin, DABT, ERT  
Toxicologist

#### Executive Summary

This proposal defines a system to improve efficiency and to reduce taxpayer costs in the review of the toxicity, chemistry, fate and exposure studies submitted in support of the registration of pesticides to the Office of Pesticide Programs of the Environmental Protection Agency. This Defined Formats approach can save OPP \$ millions/year in staff and contract work expenses derived from the taxpayers. Since the format was first proposed in the mid 1990's, OPP could

have saved over \$50 million in contract and staff expenses across all the disciplines. The Defined Formats system simply allows the pesticide companies to write the pesticide draft study analysis from the full study reports which are then reviewed by the EPA, saving taxpayer money and greatly speeding up the registration process. The pesticide companies are the experts on the study results and it would be much more efficient if they wrote the evaluation analysis and the EPA simply reviewed the evaluations for accuracy. The Defined Formats would better allow the EPA to meet the deadlines and obligations of FIFRA, FQPA and PRIA, for increased protection of children at decreased cost to the taxpayers. The Defined Formats approach to company data evaluation has applications in other offices across the Agency for further savings to the taxpayers. The computer technology to support this proposal has been available for decades.

<Defined Formats Proposal\_WIrwin Comments Accepted.pdf>