

Summary of Meeting Action Items

Event Title: Request for Reconsideration (RFR #17002A): Chloroprene Meeting with 3rd Party Correspondents

Date: November 13, 2019

Time: 3:30PM – 5:00PM

Keyword: IRIS, Chloroprene

Attendees:

- Kevin Kirby, EPA/OMS
- Tina Bahadori, EPA/ORD
- John Vandenberg, EPA/ORD
- Paul Schlosser, EPA/ORD
- Allen Davis, EPA/ORD
- Dahnish Shams, EPA/ORD
- Kate Reilly, EPA/OAR
- Tracy Sheppard, EPA/OGC
- Brian Heninger, EPA/OP
- Dan Axelrad, EPA/OP

- Marco Kaltofen, Worcester Polytechnic Institute
- Wilma Subra, Louisiana Environmental Action Network
- Dale Hattis, Clark University
- Keeve Nachman, Johns Hopkins University
- Dorian Spence, Lawyers' Committee for Civil Rights Under Law
- Maryum Jordan, Lawyers' Committee for Civil Rights Under Law
- Cayce Peterson, The Lambert Firm
- Hugh Lambert, The Lambert Firm
- Ruhan Nagra, University Network for Human Rights
- Robert Taylor, Concerned Citizens of St. John
- Mary Hampton, Concerned Citizens of St. John
- Michelle Mabson, Earthjustice
- Emma Cheuse, Earthjustice
- Kathleen Riley, Earthjustice

Summary of Meeting Activities:

- The purpose of this meeting was to consider stakeholder perspectives regarding a Request for Correction (RFC) and Request for Reconsideration (RFR) submitted to the Agency by Denka Performance Elastomer LLC (DPE) concerning the Toxicological Review of Chloroprene. This meeting was requested by a coalition of 3rd party correspondents including research universities, non-governmental organizations and concerned citizens adversely impacted by chloroprene in their community.

- EPA provided a brief introduction to the Overview EPA’s Information Quality Guidelines (IQG) Process and notes that the Request for Reconsideration ([RFR 17002](#)) appeals [EPA’s response](#) to Request for Correction ([RFC #17002](#)) challenging the Toxicologic Review of Chloroprene in support of summary information on the Integrated Risk Information System (IRIS).
 - EPA noted that this was a listening session and information that is not already public knowledge would not be discussed. Additionally, EPA welcomed the thoughts and positions provided at the meeting, but also noted that the Agency would not be able to respond to certain questions.

- Stakeholder Presentations regarding DPE IQG Requests
 - Michelle Mabson, Staff Scientist, Healthy Communities, Earthjustice
 - No presentation, Ms. Mabson provided introduction to stakeholders and their objection to the DPE IQG Request.
 - Ruhan Nagra, Univ. Network for Human Rights
 - Mr. Nagra provided results of household health survey and health impact findings, see *Waiting to Die* presentation.
 - Mary Hampton and Robert Taylor, Community Members
 - No presentation, Ms. Hampton and Mr. Taylor provided perspective as long-time community members living near the Denka facility. Stakeholders described the history of the facility, the impact on the community, and strongly encouraged EPA to take action to protect public health.
 - Wilma Subra, LA Environmental Action Network, Fence-line monitoring near Denka facility
 - Ms. Subra provided results of fence-line monitoring data near Denka Facility where chloroprene and toluene are impacting the ambient air quality. Urged action from EPA to address this issue and continue monitoring the ambient air quality surround the Denka Facility, see *Stakeholders Opposition to Denka’s Request for Reconsideration of EPA’s Toxicological Review of Chloroprene* letter.
 - Dr. Dale Hattis, Clark University, Modeling Chloroprene Risks
 - Dr. Hattis discussed the utility of PBPK modeling and key scientific issues that may serve to enhance risk analysis, but cautioned that modeling should be critically evaluated, see *Improved Modeling of Human Carcinogenic Risks From Chloroprene* presentation.
 - Marco Kaltofen & Keeve Nachman - 3rd party correspondence, “Brief Response to Denka RFR”
 - Drs. Kaltofen and Nachman discussed the Denka’s request for reconsideration (RFR) and provided general and science specific comments in direct response to technical arguments presented in Denka’s RFR, see *Brief Response to Denka July 23, 2018 Request for Reconsideration #17002 Chloroprene* document.

- EPA and 3rd party correspondents agreed to maintain an open dialogue, including providing future opportunities to engage with EPA throughout the RFR process. EPA is currently evaluating a DPE submission that is anticipated to be independently peer reviewed by experts after which time it will be EPAs decision on next steps.

Action Items: NA