



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
INSPECTOR GENERAL

June 21, 2021

**MEMORANDUM**

**SUBJECT:** Notification of Evaluation:  
Cancer Assessment Review for the Pesticide 1,3-Dichloropropene  
Project No. OSRE-FY21-0214

**FROM:** Renee McGhee-Lenart, Acting Director *Renee D. McGhee-Lenart*  
Programs, Offices, and Centers Oversight Directorate  
Office of Special Review and Evaluation

**TO:** Michal Ilana Freedhoff, Assistant Administrator  
Office of Chemical Safety and Pollution Prevention

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin an evaluation within the Office of Chemical Safety and Pollution Prevention's Office of Pesticide Programs. This evaluation is a result of a hotline complaint.

The OIG's objective is to evaluate the extent to which the EPA followed policies and procedures in developing the cancer assessment for the 1,3-Dichloropropene pesticide registration review decision to prevent unreasonable adverse effects on human health. The OIG plans to conduct work at EPA headquarters. The evaluation will be conducted using *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency. The anticipated benefits of this evaluation include greater assurance that the EPA has adequate controls in place to demonstrate that it meets the Federal Insecticide, Fungicide, and Rodenticide Act requirement to prevent unreasonable adverse effects on human health.

This evaluation addresses the following top management challenge(s) for the Agency, as identified in our [\*EPA's FYs 2020–2021 Top Management Challenges\*](#) report, issued July 21, 2020:

- Complying with key internal control requirements (policies and procedures).
- Integrating and leading environmental justice.

We will contact you to arrange a mutually agreeable time to discuss our objectives. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the evaluation process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the evaluation. Throughout the evaluation, we will provide updates on a regular basis.

To expedite our evaluation, please provide us with the following information at or before our entrance conference (links to web addresses, if available, are acceptable and information can be provided as available):

1. A list of names, roles, and contact information for staff and managers involved in the development of the 1,3-Dichloropropene briefing package and Cancer Assessment Review Committee report issued on September 26, 2019.
2. All materials included in the 1,3-Dichloropropene CARC review file, including the CARC briefing package.
3. Any handouts, memos, or other materials not included in the official 1,3-Dichloropropene CARC review file.
4. All meeting minutes, videos, notes, or other documentation from any CARC meetings that discussed 1,3-Dichloropropene.
5. All comments on the draft CARC report archived by the CARC executive secretary.
6. The following documents:
  - a. *Rodent Carcinogenicity Studies: Dose Selection and Evaluation*, Health Effects Division Interim Guidance Document #G2003.02, July 1, 2003.
  - b. *Interpretation of Body Weight Data*, Health Effects Division Interim Guidance Document #G2003.01, July 1, 2003.
7. A list of all chemicals that were referred to the CARC from fiscal years 2016 to 2021.
8. A list of all chemicals that had a change in carcinogenicity classification during the registration review process from fiscal years 2016 to 2021.
9. A list of all 1,3-Dichloropropene products, registered trade names and registration numbers (that is, any registered products that could be impacted by the 1,3-Dichloropropene registration review decision).
10. The most current data available to the EPA on 1,3-Dichloropropene usage, such as acreage of pesticide use, pounds used, and pesticide usage ranking on specific crops.
11. A list of any recent or pending litigation regarding the use or potential effects of 1,3-Dichloropropene.
12. A list of any other guidance, criteria, checklist, or methodology documents relevant to EPA's cancer assessment review process for pesticides. (We will compare this list against documents already received and will request additional documents as needed.)

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in an

April 28, 2021 email message to EPA employees, conveyed his “expectation that EPA personnel provide OIG timely access to records or other information” and observed that “full cooperation with the OIG is in the best interest of the public we serve.” We will request that you immediately resolve the situation if an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the administrator and include the incident in the *Semiannual Report to Congress*.

We will post this memorandum on our public website at [www.epa.gov/oig](http://www.epa.gov/oig).

cc: Janet McCabe, Deputy Administrator  
Dan Utech, Chief of Staff, Office of the Administrator  
Wesley J. Carpenter, Acting Deputy Chief of Staff, Office of the Administrator  
Avi Garbow, Special Advisor to the Administrator  
Andrew LeBlanc, Agency Follow-Up Coordinator  
José Kercado, Backup Agency Follow-Up Coordinator  
Lindsay Hamilton, Associate Administrator for Public Affairs  
Lance McCluney, Director, Office of Administrative and Executive Services, Office of the Administrator  
Richard Keigwin, Acting Deputy Assistant Administrator for Chemical Safety and Pollution Prevention  
Carol Ann Siciliano, Associate Assistant Administrator, Office of Chemical Safety and Pollution Prevention  
Janet Weiner, Senior Audit Advisor, Office of Chemical Safety and Pollution Prevention  
Regional Audit Follow-Up Coordinators, Regions 1–10  
Sean W. O'Donnell, Inspector General  
Charles J. Sheehan, Deputy Inspector General  
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