

**From:** [Messina, Edward](#)  
**To:** [Jim Rizk](#)  
**Subject:** RE: Clarke/Inhance PFAS Information  
**Date:** Wednesday, February 10, 2021 11:32:46 AM  
**Attachments:** [Additional Q&AS.docx](#)

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Texas is on the list. See the attached additional Qs&As document that was provided to ECOS and NASDA for distribution to members.

Ed

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Ed Messina, Esq.  
Acting Office Director  
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**From:** Jim Rizk <[Jim.Rizk@Tceq.Texas.Gov](mailto:Jim.Rizk@Tceq.Texas.Gov)>  
**Sent:** Wednesday, February 10, 2021 12:30 PM  
**To:** Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>  
**Subject:** RE: Clarke/Inhance PFAS Information

Thanks for the quick response, Ed and for offering to look into information about Texas. I'll check with our staff and see if a call would be helpful and will let you know. Thanks for the offer!

Best regards,  
Jim

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**From:** Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>  
**Sent:** Tuesday, February 9, 2021 4:48 PM  
**To:** Jim Rizk <[Jim.Rizk@Tceq.Texas.Gov](mailto:Jim.Rizk@Tceq.Texas.Gov)>  
**Subject:** RE: Clarke/Inhance PFAS Information

Jim,

I will check with the team on the status of Texas for the product we investigated. However, because multiple products might be using fluorinated containers, including not just for pesticides, the chances are high that there are other products in flourinated HDPE containers that might contain PFAS chemicals. We are still finalizing the QA/QC for our tests and hope to release them soon. Happy to have a phone call if you would like more information. Maybe you have already seen the press release and Q&A site. Including in case you have not.

Press statement: <https://www.epa.gov/newsreleases/epa-takes-action-investigate-pfas->

[contamination](#)

Qs&As: <https://www.epa.gov/pesticides/pfas-packaging>

All the best,  
Ed

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**From:** Jim Rizk <[Jim.Rizk@Tceq.Texas.Gov](mailto:Jim.Rizk@Tceq.Texas.Gov)>  
**Sent:** Tuesday, February 9, 2021 5:35 PM  
**To:** Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>  
**Subject:** Clarke/Inhance PFAS Information

Hi Edward,

ECOS gave me your information as a source for more information regarding PFAS in pesticide containers. I was on the EPA state call a couple of weeks ago. Do you have information you can share regarding which states are among the 35 that received the product? Also, is a copy of EPA's study regarding the containers available for review?

Thanks for any information you can provide.

Best regards,  
Jim

**Jim Rizk**  
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## **Additional Q&As for ECOS and NASDA**

### ***Who is Clarke Mosquito? What kind of products do they design and manufacture?***

Clarke Mosquito Control Products, Inc. is a global public health products and services company, located in St. Charles, Illinois serving both public and private consumers. Along with developing and manufacturing Anvil 10+10 ULV (EPA Reg. No. 1021-1688-8329), Clarke offers a broad selection of adulticides and larvicides for use in public health mosquito control. Clarke is providing a dedicated hotline for questions: 1-630-671-3100.

### ***What is Anvil 10+10 ULV?***

Anvil 10+10 ULV (EPA Reg. No. 1021-1688-8329) is a pesticide product manufactured by Clarke Mosquito. It is used for mosquito control to protect public health by reducing transmission of mosquito-borne diseases like Zika, West Nile virus and Eastern Equine Encephalitis (EEE), a rare but deadly disease carried by mosquitos. The Anvil product is a supplemental distribution (“distributor product”) of EPA Reg. No. 1021-1688 (Multicide Mosquito Adulticiding Concentrate 2705, McLaughlin Gormley King Company D/B/A MGK).

### ***Where is Anvil 10+10 ULV used?***

According to Clarke, the states that purchased Anvil 10+10 ULV between 2018 and 2020 are the following:

Alabama  
Arkansas  
California  
Delaware  
Florida  
Illinois  
Indiana  
Louisiana  
Massachusetts  
Maine  
Michigan  
Minnesota  
Mississippi  
North Carolina  
Nebraska  
New Hampshire  
Nevada  
New York  
Ohio  
Oregon  
Pennsylvania  
Rhode Island  
South Carolina  
Texas  
Virginia  
Washington

### ***Who is Inhance Technologies?***

Inhance Technologies is a container treatment company based in Texas. They offer a wide range of surface technologies and barrier packaging, including the fluorination of HDPE containers. Inhance has reported to EPA locations in Georgia, Iowa, Illinois, Missouri, and Pennsylvania.

***How common is the use of fluorinated containers for storage of pesticides and other products?***

It is estimated that roughly 20-30% of all rigid agriculture chemical packaging in North America sold into the crop protection market are packaged in fluorinated HDPE containers.

***Does EPA have a comprehensive list of pesticides stored in these fluorinated containers?***

Fluorinated HDPE containers are widely used as chemical-resistant containers for laboratory and industrial chemicals storage. Although registrants are required to provide details regarding the type of container in which their pesticide product is distributed commercially, this is the first time that EPA has been aware of fluorinated HDPE container use as a potential source of PFAS contamination in a pesticide. EPA is using its authorities under FIFRA and TSCA to work with other federal agencies, the pesticide industry, states and localities to gather more information about the potential scope of this contamination and to evaluate whether other regulated products may be affected.

***What are EPA's regulations on the type of containers that may be used for pesticide storage?***

EPA established requirements for containers used to sell or distribute pesticides to ensure that containers are strong, to minimize human exposure to pesticides while handling containers and to facilitate the disposal and recycling of pesticide containers. The specific requirements vary according to the type of container. Portable refillable containers must meet certain Department of Transportation (DOT) design, construction and marking requirements; be marked with a serial number or other identifying code; and have a one-way valve and/or a tamper-evident device on all openings. Nonrefillable containers must meet certain DOT design, construction and marking requirements; have standard closures; allow the contents to pour in a continuous stream and meet a cleanability standard. For more information about EPA's pesticide container regulations, see EPA's Pesticide Container web page.