

Subject: Budget reduction for the EPA: Information Regarding Eliminating the ORD

McIntosh.Chad@epa.gov

Dear Assistant Administrator McIntosh Chad,

I imagine you are currently deeply engaged in your current role as Assistant Administrator of EPA's Office of International and Tribal Affairs and congratulate you on your nomination. I appreciated your reference to the amazing progress America has made in protecting air, water, soil, and food, since the beginning of your career in your hearing before congress, when as you mentioned, Lake Erie would catch fire, and certain industries would simply dump their hazardous waste into the surrounding environment or down highways. I appreciate your nuanced approach having worked both with industry, for example your long career at Ford, who need federal regulation to not have to deal with a patch work of state level regulations, and government, which must serve its constituents so major health crisis can be averted from pollution. As an engineer, you know how essential strong science is for carrying out EPA's mission and your current work.

To aid administrator Zeldin in cutting costs at the EPA and determine areas for deregulation at the EPA, while preserving the base needs of the American people to have access to clean air, water, and food is a challenging task. **I hope to provide information that is relevant to the upcoming decision about the EPA ORD, given the recent plan to potentially terminate the ORD.**

I am a leading expert in environmental chemical analysis, developing new technologies and software for the measurement of PFAS, which are used by thousands of scientists. **As CEO of Innovative Omics, EPA contractor, and faculty at Yale, I have directly worked with over 50 researchers of the EPA's ORD. I can personally state that the top-leaders in the field of measurement and remediation of environmental toxins, specifically per and poly-fluorinated substances (PFAS) are from the EPA ORD Department, and that the ORD has incredible talent, doing incredible work with only a small fraction of the EPA's budget.** At scientific conferences, community forums, and in academic forums it is the EPA ORD leading science in PFAS in the US. **Without the EPA ORD the EPA will be "running blind" in any urgent or long-term responses to the PFAS issue and other issues related to hazardous pollution; if any new public outcries occur over environmental emergencies, the EPA will no longer have the expertise to tackle the issue efficiently and intelligently without the ORD. Utilizing outside contractors will be extremely expensive, if the contractors needed even exist.**

Of course, this is not just in relationship to PFAS. Most emergency response with chemical hazards, for example Flint, Michigan and LA wildfires, and many continual state initiatives to ensure quality water, air, soil, and food, rely on the EPA ORD. **Red and Blue states will suffer without the EPA ORD services.**

Moving some leading scientists from ORD to other portions of the EPA will not help; there are highly sophisticated instruments at the ORD laboratories needed to do state-of-the-art measurements to ensure safety of food, air, water, and soil. The scientists at the EPA are top-notch with high expertise needed to run these instruments, analyze the data, and interpret the findings for real world action. **Eliminating the scientists will also mean all the taxpayer money which has gone into building the infrastructure needed for them to perform their job will go to waste** as these instruments, which are often extremely difficult and expensive to move, go unmaintained and there is no one to utilize them. The work they do is unique cutting edge research which serves all Americans (see some examples below), this work and the infrastructure needed is not found in

any other EPA agency.

I have included specific important activities undertaken by the EPA ORD at the end of this email, compiled by colleagues. **I am happy to answer any questions you, or your staff, may have, and help serve as a resource for the important decisions you are making.**

Some specific examples of activities conducted by US EPA ORD include:

- ORD discovered the cause of lead contamination in Flint, Michigan, allowing the state and federal government to move forward on a solution
- ORD is actively supporting clean-up and monitoring efforts around the LA wildfires
- ORD is functionally the only arm of the federal government capable of carrying out non-targeted analysis to identify unknown and unregulated chemicals in food, water, and the environment.
- Several other agencies have HRMS instrumentation but lack the permission, expertise, or bandwidth to actively provide NTA data to States and communities
- The ORD "waiting list" for this type of analysis is years long, as there are so many requests for NTA data and so few facilities capable of this analysis
- I'm currently aware of only a few contract labs in the US offering PFAS suspect screening and NTA/discovery analysis. They generally charge thousands of dollars per sample and have limited capacity.
- ORD's targeted and non-targeted analysis capacity have played a foundational role in addressing PFAS issues around the country. For example,
- ORD discovered [GenX](#) in Cape Fear River, SE North Carolina
- ORD discovered [Cl-PFPECA](#)s in SW New Jersey
- ORD discovered emerging PFAS in [drinking water](#) across the country
- ORD actively working on developing analytical and data handling methods to characterize PFAS in [air](#) using non-targeted analysis
- ORD is supporting drinking water providers around the country to test [for unknown chemicals](#) and providing [technologies](#) to remove known and unknown chemicals from drinking water
- As PFAS producers continue to introduce new PFAS, ORD's expertise identifying novel PFAS is vital to protect communities around the country from continued and emerging PFAS contamination

Looking forward to your response,

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PS: Sorry for multiple emails, I know the EPA often put's emails outside the agency into the spam folder, so I am sending from my personal, faculty, and corporate email.

PSS: I am also open to working as a liaison between top level EPA administrative staff and scientists at the EPA to find possible avenues for reducing costs.