A Chronicle of Deception – A Nancy Beck Retrospective

Nancy Beck has made a career of manufacturing doubt and undermining scientific evidence. This document attempts to chronicle this troubling history, documenting instances throughout her career that demonstrate this trend. Events described in some sections are discussed in greater detail elsewhere in this document.

Sec. 1 - THE NANCY BECK PLAYBOOK

- **Playing up the uncertainty of health-adverse findings**
  - While Beck was at OMB, Beck's office made direct, substantive edits to scientific conclusions to increase perceived uncertainty and downplay the significance about potential health-adverse findings (e.g., PBDEs, Dibutyl Phthalate) and directly edited out scientists' mention of potential human health implications in a number of research papers
- **Playing down existing research, especially animal studies**
  - At OMB, Beck criticized reliance on animal studies; edited out discussions of potential implications for human health (e.g., PBDEs, Dibutyl Phthalate); and made findings of adverse health effects more vague; at the EPA, she downplayed the real-world impacts of toxic chemicals
- **Criticizing health-protective dose response models**
  - At ACC, Beck criticized lack of research on low-dose exposures (e.g., on inorganic arsenic), a direct challenge to the precautionary linear no-threshold model
- **Trying to limit the sources of risks that would be considered for chemical assessments**
  - At ACC, Beck lobbied EPA to limit "refined" (more rigorous) risk evaluation to only certain chemicals; suggested that "EPA need not include every conceivable condition of use in a risk evaluation"; at the EPA, this change was accomplished in TSCA
  - While at EPA OCSPP, Beck excluded pathways of exposure from risk assessments, including excluding exposures from legacy uses of asbestos, and environmental exposures.
    - Keep in mind: the 9th Cir. Has ruled that EPA's own regulations do not give them the authority to exclude other sources of exposure or conditions of use.
- **Encouraging consideration of industry-funded research despite conflicts**
  - At ACC, Beck argued to EPA that all research, "regardless of affiliation or funding source," should be considered for cancer assessments (e.g., inorganic arsenic)

    - At ACC, Beck argued that study funding sources should not be a factor for EPA to consider, supporting an industry study of Ethylene Oxide cancer risk over NIOSH data.
- **Sought to reassess "underlying data" in research, a trojan-horse tactic akin to the Secret Science rulemaking currently proposed by EPA**
    - At ACC, Beck criticized EPA chemical assessments for not divulging the value or limitations of underlying research studies (e.g., 1-bromopropane) and was one of the architects behind EPA's restricted science rule
    - At ACC, Beck argued that a study of ammonia risk should be excluded from consideration if raw individual data was not made available.
- **Co-opting terms like "best available science"**
    - At ACC (and only a few months later at EPA), Beck criticized the EPA for its definitions of "best available science" and "weight of the scientific evidence" and called for updates to the terms during Senate testimony in 2017
- **Slowing down the chemical review process**
    - At OMB, Beck and other officials pressed IRIS to revamp its review process, incorporating more OIRA review which would delay release; these efforts were detailed by GAO in April 2008, and led to a House committee to conduct a full investigation and publish a report on those efforts in 2009

Sec. 2 - DETAILED TIMELINE OF BECK'S PROFESSIONAL ACTIVITY AT OMB'S OIRA

- **2004-2008:** Beck and John Graham, the head of OIRA at the time (Beck's supervisor, responsible for her hire) pressed IRIS to revamp the process of reviewing/discussing IRIS entries; this became a full-fledged, multi-year effort, throughout which Beck/Graham incorporated more OIRA participation in the IRIS process and lengthened the average time each review takes (see House investigation report, pages 13-15, 2008 GAO report and April 2008 testimony before Senate EPW).
- **Jan. 9, 2006:** Under Beck's direction, OMB issued a risk assessment bulletin that significantly changed the way risk assessments would be conducted, a shift in policy that was widely criticized.
    - The NAS committee issued a strong rebuke of the report's "presentation of a new definition of risk assessment, its omission of discussion of the important role of default assumptions and clear criteria to modify or depart from defaults, its proposal of risk *assessment* standards related to activities traditionally regarded as risk *management* activities, and its requirement for formal analyses of uncertainty and presentation of "central" or "expected" risk estimates." NAS called the proposal "oversimplified" and "fundamentally flawed" and "recommends that it be withdrawn."
        - Specifically: "Dividing effects into 'adverse' and 'nonadverse' ignores the scientific reality that adverse effects may be manifest along a continuum. The committee concludes that the bulletin's treatment of adverse effects is too simplistic and restrictive and ignores important factors in determining appropriate effects to evaluate, the scientific information available, and an

understanding of the underlying biochemical mechanisms for an effect of interest."

- Of particular relevance to Beck today, CPSC provided comment to the NAS regarding the approach she authored, noting: "The staff believes a number of provisions in the Bulletin could have a negative effect on the quality, conduct, and use of risk assessments undertaken by the CPSC….The Bulletin's general requirement (Section IV, 6) that Executive summaries should 'place the estimates of risk in context/perspective with other risks familiar to the target audience' could have three negative effects. First, staff resources will be needed for the analysis of other risk assessments to determine (a) comparability and (b) validity of the analysis. In some cases, the comparable risk may be in areas outside the expertise of CPSC staff and outside assistance may be necessary. Second, we expect that there will be challenges to the selection of comparable risks, especially when the choice of appropriate comparisons is limited. Third, putting comparative risk information in an Executive Summary, without an explanation of the context in which it was derived, could mislead the reader." Full comments can be found here.

- NRDC sent a comment letter accusing the proposal of "[protecting] industry assessments from scrutiny" and "[forcing] itself upon scientific and policy issues"
- ACC sent a letter directly to Beck praising her report draft and suggesting that the proposal would "improve the uneven performance of risk assessments at EPA"

- **February 2006:** Beck is said to have objected to including the benefits of limiting lead paint exposure in home renovations in cost-benefit assessments in an EPA report suggesting that, according to the author of a report that concluded lead paint is probably a contributing factor to cardiovascular health in adults.
- **June 11, 2009:** During her time as toxicologist at OMB, the House oversight subcommittee published a report on the "suppression of environmental science by the Bush administration's Office of Management and Budget"
  - The report chronicled how, rather than OMB serving as a coordinator other agencies' scientific comments (which OMB officials had previously testified to – see pg. 5), individuals at the OMB – namely Beck – were directly and substantively making changes to EPA's scientific reports/findings (see 'chemicals' section below)
    - Of particular relevance today, the scientific conclusions Beck tried to interfere with were in regards to the chemical polybrominated diphenyl (PBDE), a key type of organohalogen flame retardant – an issue which will be before the CPSC.
  - Suggested that OMB's OIRA was deliberately slowing down reviews for chemicals
    - Two months' OMB review for polybrominated diphenyl; more than a year of OMB review for toluene

AT ACC

- **Jan. 28, 2013:** Beck comments on behalf of the ACC regarding inorganic arsenic – a highly toxic carcinogen, common water contaminant, and registered pesticide:
    - complained that EPA's public meeting lacked enough industry representation to make it 'balanced', and offering additional industry representatives for future meetings;
    - argued that high dose arsenic exposures are not relevant to 'today's environmental exposures in the U.S.' when in truth tens of millions of Americans are currently exposed through drinking water to unsafe levels of inorganic arsenic;
    - promoted threshold models for cancer, which presumes that there is no cancer risk at doses below the observable range of data, in other words, if the blunt tools of industry can't see it, then it must not exist;
    - said 'mode of action should be considered as a central organizing principle', which is another red herring, just like her 'threshold' dodge above, since science can't fully explain the mode of action of any carcinogen or cancer type (for example, how tobacco causes cancer is not fully understood, but it does, and so regulators and others take measures to prevent harmful exposures)
- **Dec. 13, 2013:** Beck comments on behalf of the ACC regarding two highly toxic solvents, NMP and Methylene Chloride, Beck advocated for a delay, saying that EPA's work should be 'treated as screening-level' and further 'refined', and in the 7 years since then, Beck has implemented this delay tactic, even while at EPA and despite Congress giving EPA authority to finalize the proposed assessments – in that intervening time, at least four people have died from exposures to methylene chloride that could have been prevented by EPA's rule.
- **Aug. 24, 2016:** After the bipartisan passage of the Lautenberg Chemical Safety Act, Beck submits to Cleland-Hamnett the ACC's comments regarding "risk evaluations" for the new rule,
    - ACC argued that "EPA should generally exclude OSHA-regulated uses [of chemicals] from the scopes of TSCA risk evaluations" – despite the fact that workers are specifically identified in the revised TSCA as an example of a "susceptible" population that should be given special consideration and protected under the law. During Beck's tenure, EPA's risk evaluations have assumed wrongly and without basis that workers will be fully protected by personal protective equipment 100% of the time – that is a false assumption - and therefore their workplace exposures to dangerous and deadly chemicals like methylene chloride, 1,bromopropane, carbon tetrachloride and TCE won't pose an unreasonable health risk.
    - ACC argued that EPA was not required to consider all conditions of use when evaluating chemicals under the revised TSCA, overturning Congress' intent for a full accounting of chemical harm. Beck imported ACC's position into EPA's final framework rules. Ultimately, a Federal Appeals Court ruled against Beck and ACC (which was an intervenor in the case) that EPA's regulations do not allow the Agency to pick and choose amongst various uses of a chemical and sources of exposure as part of its risk evaluation.
- **Mar. 9, 2017:** During her employment with ACC, Beck criticized the EPA's IRIS program for its failure to release a "systematic review" method consistent with NAS

recommendations. However, the IRIS program's systematic review method has now been approved by the NAS, but Beck used her position at EPA to block it from public release. Beck also testified about the importance of peer review, but her office created its own "systematic review" to implement TSCA, without undergoing peer review. It has since been heavily criticized by the TSCA Science Advisory panel and is now finally undergoing peer review by the NAS.

AT EPA

- **May 1, 2017:** Beck's first day as deputy assistant administrator in EPA OCSPP
    - Scott Pruitt hired Beck through an obscure provision of the Safe Drinking Water Act, which allows the EPA Administrator to hire up to 30 people without White House or congressional approval – meant to expedite hiring of specialists in stressed offices
    - Beck's hiring through SDWA meant that she did not have to sign Trump's ethics pledge
- **May 12, 2017:** Hamnett records in notes that Beck insists, in meetings, that EPA ought not to consider "all uses" in evaluating chemical threats, and that definitions (best available science, etc.) ought to be included (against most other scientists' beliefs)
- **May 24, 2017:** Within a month of starting at EPA, Beck meets with industry representatives from the Society of Chemical Manufacturers & Affiliates (SOCMA), along with Pruitt
- **May 30, 2017:** Office of Water career scientist, Michael Shapiro, sends memo objecting to changes that Beck requested on the Final Rule on Procedures for Chemical Risk Evaluation Under the Amended Toxic Substances
    - **EPA employees** noted that Beck's changes – to track only certain subsets of a chemical's use to assess risk, instead of all subsets – would exclude numerous sources of risk
- **May 30, 2017:** Office of General Counsel sends memo to EPA employees (and Beck) suggesting that Beck's proposed changes could present legal problems, esp. the new definition of 'best available science,' which would not be a "'logical outgrowth' of the proposal and the comments"
- **Early June 2017:** WCED concurs (at direction of political appointees) with Beck's TSCA amendments but says it "shares the concerns voiced by other offices at the May 30, 2017 FAR meeting—including OLEM, OW, and OP"
- **June 8, 2017:** Beck seeks and receives permission to "participate fully in matters of general applicability, including rulemaking," that involve ACC, her former employer. This includes attending meetings with ACC (with other EPA officials, and only if other companies/entities are also present); discuss comments submitted by ACC, etc.
    - Ethics official notes that Beck has "extensive prior expertise with the regulated industry's perspective and already familiar with (and may well have authored) ACC comments"; this expertise will help the agency "consider all perspectives."
    - In response, in October 2017, Citizens for Responsibility and Ethics in Washington requested the EPA IG investigate Beck's participation.
- **June 9, 2017:** Submits a "recusal statement" reiterating the above to Cleland-Hamnett

At the White House

- **Dec. 20, 2019:** EPA's Office of Chemical Safety and Pollution Prevention issues a draft risk evaluation on trichloroethylene (TCE), which establishes fetal heart defects as a baseline for determining unsafe exposure levels of TCE
    - **However,** this draft risk evaluation was sent to the White House, the Executive Office of the President – where Beck was working – directed EPA scientists to "substantially rewrite their evaluation by discarding the science on TCE's role in fetal heart defects"
    - **Feb. 21, 2020:** The official risk evaluation on TCE is released after White House EOP (Beck's office) interference; the official version deemphasizes TCE's association with fetal heart defects and instead uses "immunosuppression" as a baseline for risk
        - The White House also deleted all 322 instances of the phrase "cardiac toxicity" from the draft risk evaluation and increased mentions of "immunosuppression" more than 30-fold. The ramifications of this political interference are immense. TCE is still used extensively in consumer and industrial contexts, and the chemical persists even where use has subsided: Research shows that TCE leaches into groundwater and contaminates the drinking water of 14 million Americans. It has been found on 1,400 military bases and nearly 800 Superfund sites, and babies born to mothers who live near TCE-emitting facilities are at increased risk of congenital heart defects. By burying the science on TCE's danger, the EPA may be paving the way for its continued use, and protecting industry from the enormous liability of cleaning up this unsafe chemical.
        - **It is not yet been documented whether** Beck directly influenced these revisions – EPA declined interviews, and email attachments from the White House were unsigned (this has also been the case with other revisions that Beck was likely involved in)

Sec. 3 - CHEMICAL-SPECIFIC COMMENTARY & CRITICISM

- **Polybrominated diphenyl ethers / PBDEs**
    - Chemical background: Industrial flame retardants[1], not produced in the US now but present in homes, furniture, food; disrupt thyroid hormone levels; exposure is linked to deficits in IQ and motor development
    - At OMB, Feb. 15, 2006: Beck substantively edits one of Vandenberg's reports (examples are below, *with Beck's edits and comments italicized*) – overall, Beck edits conclusions to increase sense of uncertainty; edits descriptions of chemical effects to make them more vague and less specific; criticizes foundational studies (e.g., animal studies); edits out discussion of potential implications for human health

[1] Still found in many household items – see health-protective CPSC decision made in Sept. 2017 regarding product imports: https://greensciencepolicy.org/CPSCPetition/

        - Strategies: extensive, substantive edits to research reports (which OMB officials denied doing)
    - **PentaBDE (BDE-99)**
        - "This may imply that different activities may expose different age groups more than others, or that some PBDE congeners may accumulate differently with age, *however the sample size here is very small and firm conclusions cannot be made"*
        - *Beck comments, "This study mentions many supporting studies […] however don't most of these studies have the same study design problems?"*
    - **TetraBDE (BDE-47)**
        - "Alterations of behavioral parameters, namely impaired motor functions and decreased habituation capability worsening with age, have been shown to occur in adult male mice neonatally exposed to BDE-47 […] ~~*These behavioral disturbances raise concerns about possible developmental neurotoxicity in children."*~~ (Beck edits out last sentence)
        - *"Add that […] the implications of CAR activation is not well known"*
        - *"How do we know the results are 'relevant to exposure in people'? […] Hormone stores and half lifes [sic] in rodents are quite different than levels in humans"*
        - *"It seems that other than the fact that neurotox guidelines list functional neurotoxicity as an effect, and that there are PDBEs in human tissues, [there is] no support for relying on [the Eriksson] study"*
    - **Hexa (BDE-153)**
        - Beck deletes: "Based on [multiple studies], the activation of these receptor sites is associated with immunotoxicity, reproductive effects and carcinogenesis, all endpoints of interest for PBDEs" – Beck calls this 'unclear'
        - "Alterations of behavioral parameters…have been shown to occur in adult male mile neonatally exposed to BDE-153 […] These behavioral disturbances raise concerns about possible developmental neurotoxicity in children." → Beck comments, *"Considering the problems with study design, is this truly a concern? How do these disturbances relate to what we may see in humans? Are the disturbances actually adverse?"*
            - In 2007, in response to the risk assessment bulletin published by Beck, the National Academy of Science took the unprecedented step to recommend OMB withdraw this "fundamentally flawed" standard. "We began our review of the draft bulletin thinking we would only be recommending changes, but the more we dug into it, the more we realized that from a scientific and technical standpoint, it should be withdrawn altogether," said John F. Ahearne, chair of the committee that wrote the report, and director, ethics program, Sigma Xi, The Scientific Research Society, Research Triangle Park, N.C.
    - **DecaBDE (BDE-209)**

        - Beck's edits substantially change the meaning: "Results…provide ~~**no**~~ evidence that parent decaBDE…***does not*** react directly or indirectly with DNA to cause either gene mutations, DNA damage, or chromosomal effects."
        - Beck replaces "neurobehavioral developmental toxicity" with "changes in spontaneous motor behavior" → less specific
- **Toluene**[2]
    - Chemical background: colorless liquid used in industrial feedstock and as solvent (in paint thinners, markers, cement, petrochemicals); exposure in utero can damage fetal development; possible link to blood cancer and lymphoma; acute poisoning can be fatal
    - OMB's extensive edits/comments on a toluene report were submitted Dec. 30, 2003 and on Apr. 19, 2005. Comments may not be Beck's specifically (may be Schwab's), but this reflects how long OMB took to review the toluene report multiple times.
        - Whether they are Beck's specifically or not, the edits OMB suggests reflect issues Beck pushed for years → asks EPA to "clearly explain" the weight of evidence method; to elaborate more on the limitations of the methods used, e.g., "The added discussion should highlight…that some of these neurological endpoints may not actually be 'adverse'…"
            - Once again, Beck is questioning whether a health effect is "adverse"
        - Strategies: extensive, substantive edits to research reports (which OMB officials denied doing); long review periods to drag out final decisions
- **Dibutyl Phthalate**[3]
    - Chemical background: fragrance ingredient, plasticizer, solvent used especially in nail polishes; banned in the EU and classified in CA as a reproductive toxicant; strong evidence of endocrine disruption and environmental toxicity; evidence that exposure in children is linked to liver/kidney failure
    - Dec. 2005, at OMB: Beck makes extensive suggested edits to scientific report; repeatedly asks if worrying results are "statistically significant"; repeatedly asks that the report clarify that many of the studies concerned rodents, not humans; asks, "Why is the confidence high when there are no human developmental or reproductive data?"
        - Strategies: extensive, direct edits to research reports to increase uncertainty, cast doubt on existing (and widely used) studies, esp. animal studies

[2] CPSC has jurisdiction over a number of chemical labeling requirements – toluene labeling is regulated under 16 C.F.R. 1500.14: https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/FHSA-Requirements

[3] In Oct. 2017, CPSC banned five types of phthalate chemicals, including dibutyl phthalate, from children's toys and other products: https://uspirg.org/news/usp/children%E2%80%99s-toys-victory-cpsc-bans-phthalates-toys

- **Lead**[4]
  - Chemical background: Metal linked to intellectual disabilities, sterility, anemia, coma, seizures, and myriad other neurological and gastrointestinal symptoms, especially in children; lead paint is probably linked to cardiovascular disease in adults (see below)
  - May 17, 2007: Beck pressured Cleland-Hamnett and other EPA officials to revise a report's language; her revisions would have diminished / muted the link between lead and cardiovascular disease in adults
    - In OMB's edited version (likely Beck), text is edited to downplay severity of toxicity symptoms: "Adverse health effects in adults may include hypertension, coronary heart disease (CHD), stroke, blood disorders, kidney damage, thyroid hormone abnormalities, immune system damage, many types of neurological abnormalities, increase incidence of stillbirths and miscarriage, low sperm rates, abnormal sperm, and infertility" →Beck deleted this and rewrote as, *"Both epidemiologic and toxicologic studies have shown that environmentally relevant levels of Pb affect many different organ systems."*
- **Methylene Chloride**[5] **/ DCM**
  - Chemical background: Compound in paint strippers, adhesives, some automotive products; acute exposure can cause death by cardiac arrest / asphyxiation; chronic exposure linked to nervous system impairments, cancer, and organ toxicity; EPA delay in finalizing a ban until 2019, but the ban applies to consumers, not workers, even though several workers died while using the chemical during the two years before the ban issued
  - At ACC, Dec. 13, 2013: Beck commented on behalf of the ACC regarding DCM and NMP, advising EPA to use a "Margin of Exposure Approach" to screen for / prioritize hazards; still looking for the full ACC comments
  - Beck also co-authored a paper in 2016 with failed EPA Toxics AA nominee Michael Dourson that found that the "acceptable risk levels" previously set by EPA for 24 chemicals, including methylene chloride, can and should be relaxed
- **Inorganic Arsenic**
  - Chemical background: Metalloid once created as a byproduct of industrial smelting; now present in contaminated food, groundwater, pressure-treated wood, air; causes acute and chronic poisoning and is carcinogenic
  - At ACC, Jan. 28, 2013: "…there did not appear to be agreement regarding human health risks [from inorganic arsenic] at low dose exposures. We were thus disappointed that the draft Scope does not specifically focus on evaluating cancer and non-cancer health effects in the exposure range relevant to US citizens. […] ACC encourages EPA to evaluate and include alternative extrapolation models,

[4] CPSC has worked on lead, especially lead exposure in children, for years: https://www.cpsc.gov/Business--Manufacturing/Business-Education/Lead/Lead-in-Paint. Potential opportunity to slow down business compliance processes?

[5] Most uses of DCM have been banned in the EU since 2011; in the US, until recently, only warnings on product labels are required. After the Lautenberg Chemical Safety Act passed in 2016, the chemical industry petitioned for more dire product labeling – but they did so b/c, if EPA bans DCM, industry can say, "This is under CPSC jurisdiction now." https://www.webmd.com/lung/news/20170714/mother-questions-use-of-chemical-after-sons-death

including scientifically plausible threshold models for the analysis of cancer data…"
        - Strategies: Criticizes lack of data on low-dose exposures, a common industry challenge to the precautionary linear no-threshold model
- **Tert-Butanol / tert-Butyl alcohol / TBA**
    - Chemical background: solvent, denaturant; ingredient in paint removers, fragrance; moderate bioaccumulation; some evidence of toxicity in animals at moderate doses
    - At ACC, June 30, 2016: Expressed concern over "use of outdated and problematic Preamble," "criteria for evaluating study quality," benchmark dose modeling transparency ("present extra risk and relative deviation findings; provide a clear justification of the modeling choice"), "Quantitation of the suggestive cancer endpoint" (requests comment on the 'strength of the evidence' of carcinogenic potential)
        - Strategies: Criticizes EPA for not publicizing enough about the review and underlying studies; suggests EPA's assessment metrics were not clear
- **1-bromopropane / n-propylbromide / nPB**
    - Chemical background: Liquid or gaseous solvent used in aerosol glues (esp. for foam), asphalt, synthetic fiber production, degreasing, dry-cleaning; high exposure can cause profound neurological/nervous system damage; likely carcinogenic
        - EPA's most recent draft risk assessment found that a single exposure at high occupational levels can lead to birth defects.
    - At ACC, Mar. 9, 2017: "EPA did not conduct a systematic review, and the draft assessment did not provide information regarding the quality of the individual studies…EPA simply chose the value that […] would be most health protective… [The] draft risk assessment is not consistent with the best available science or the [weight of the evidence] approach envisioned under the LCSA"
        - Strategies: Criticizes EPA for not publicizing enough about the review and underlying studies; suggests EPA's assessment metrics were not clear
- **Perchloroethylene**[6]
    - Chemical background: Liquid solvent used widely in dry-cleaning, industrial manufacturing, degreasing; found in contaminated drinking water in 44 states; toxic to the brain, kidney and liver and probably carcinogenic
    - October 2016: Beck and failed nominee to run EPA's Toxics program Michael Dourson (served as special assistant to Pruitt) co-authored an ACC-funded research paper that found that the "acceptable risk levels" previously set by EPA for 24 chemicals, including perchloroethylene, can and should be relaxed -- in the case of PERC, relaxed to a level that is 12.5 times less protective

[6] CPSC has jurisdiction over a number of chemical labeling requirements – perchloroethylene labeling is regulated under FHSA 1500.83(a)(31): https://www.ecfr.gov/cgi-bin/text-idx?SID=3e7636d98dae34c20e70cc20b4522f76&node=16:2.0.1.3.79.0.1.30&rgn=div8

- **Trichloroethylene (TCE)**[7]
    - Chemical background: Industrial solvent/degreaser used for electronics, dry cleaners, metal; conclusively carcinogenic, damages fetal hearts; contaminates water, air, and soil around the country, including at 1,400 military facilities and 800 Superfund sites
    - At OMB: Beck's office had "almost daily involvement on TCE," and a House investigation concluded that the office was working to slow the decision-making process
    - March 2013: Beck, at ACC, submits comment letter to EPA regarding a number of chemicals, including TCE; she criticizes the EPA for making "many overly conservative assumptions that skew the assessment to overestimate risk"
    - Dec. 20, 2019: When EPA's OCSPP issued a draft evaluation on TCE, establishing fetal heart defects as a baseline for determining unsafe exposure levels, the White House's Executive Office of the President – where Beck was working – directed EPA scientists to "[discard] the science on TCE's role in fetal heart defects"
        - The official risk evaluation deemphasizes TCE's association with fetal heart defects and instead uses "immunosuppression" as a baseline for risk
        - Ex. of change (strikeout text) after WH interference: "The drivers for EPA's determination of unreasonable risk for workers are ~~*developmental cardiac toxicity*~~ *immunosuppression*…"

Sec. 4 - SUMMARY OF EDUCATION (IN ITALICS) & PROFESSIONAL EXPERIENCE

- *1984-1988: BS, Microbiology, minor in Economics, Cornell University*
- 1988-1990: Microbiologist | **Estee Lauder Group of Companies**
    - Worked on preservative systems for products; developed in vitro tests to replace the Draize rabbit test; Beck considers this experience her first foray into toxicology
- *1990-1992: MS, Environmental Health (focus on toxicology), University of Washington*
- *1992-1998: PhD, Environmental Health, University of Washington*
- 1999-2000: Toxicologist/Public Health Advisor | **Washington State Department of Health**
- 2000-2002: AAAS Science & Technology Policy Fellow | **Environmental Protection Agency**
- 2002-2012: Toxicologist/Risk Assessor | **OMB's Office of Information and Regulatory Affairs**
- 2012-2017: Senior Director, Regulatory Science Policy | Division of Regulatory & Technical Affairs | **American Chemistry Council**
- May 1, 2017-Dec. 2018: Deputy Assistant Administrator | **EPA's Office of Chemical Safety & Pollution Prevention (CSPP)**
    - Salary: $161,900; top political appointee in the office

[7] EPA's Feb 2020 draft risk evaluation on TCE (see notes) reversed efforts to ban it; labeling CPSC has jurisdiction over consumer uses (e.g., in dry cleaning) and took up the mantle. https://www.epa.gov/tsca-cbi/draft-risk-evaluation-trichloroethylene#findings

    - Limited information about her work throughout 2018 and into 2019
- Dec. 2018-June 2019: Principle Deputy Assistant Administrator | **EPA's OCSPP**
- June 2019-present: Unspecified role | **White House Council of Economic Advisors**
    - LinkedIn indicates that she works at OCSPP; little information is available about her involvement at the White House
- March 2020: The White House nominates Nancy Beck to head the Consumer Products Safety Commission