



Dear Subscriber,

We are pleased to enclose the April 2024 Update for your 6-volume TSCA Compliance Guide and Online Service.™

- 1) **TSCA Fees Rule.** On February 8, 2024, EPA finalized amendments to the 2018 TSCA Fees Rule, updating how EPA recovers costs associated with TSCA’s implementation and ensuring that the fees collected cover 25% of authorized costs, as directed by Congress. The 2016 Lautenberg Amendments greatly increased the costs of implementing TSCA and Congress authorized EPA to collect up to 25% of those implementation costs. However, the 2018 TSCA Fees Rule was insufficient to collect the full amount authorized, resulting in EPA collecting less than half of what it is permitted to collect, necessitating the amendments discussed herein. But while EPA will be collecting more under the amended fees rule, EPA cut the estimated cost to implement TSCA programs by 19% between the release of the proposed rule and the final rule, at least in part by identifying numerous efficiencies through recent experience implementing TSCA. Thus, the annualized fees collected from industry actually decreased from \$45 million in the proposed rule to \$36.69 million in the final rule. Approximately \$2.4 million of the \$36.69 million industry burden is expected to come from small businesses. Of note, between the proposed rule to the final rule, the fees for an EPA-initiated risk evaluation have dropped from \$5.1 million to \$4.3 million, and the fees for new chemical review dropped from \$45,000 to \$37,000. Those numbers still represent significant increases from the current fees, however, as the prior fee for an EPA-initiated risk evaluation was \$1.6 million and for the prior fee for new chemical review was \$19,000. This final rule is effective for at least three years, after which EPA can adjust the fees to better align with administrative costs. The new rule is reflected on pages E5-19 of your TSCA Guide. See 89 FR 12961.
- 2) **Extension Deadline.** On February 15, 2024, EPA announced an extension to the 2024 submission deadline for polymer exemption reports under the TSCA New Chemicals Program. The deadline, which was January 31, 2024, was extended to March 31, 2024, due to technical difficulties associated with the launch of the new electronic reporting tool. The polymer exemption permits companies to manufacture (or import) polymers meeting exemption criteria without submission of a premanufacture notice or an exemption notice under the TSCA New Chemicals Program. There are, however, reporting and recordkeeping requirements associated with the polymer exemption, and companies relying on the exemption must submit an annual report on the number of exempted polymers they

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manufactured (or imported) during the previous year. The extended deadline applies only to 2024. This is reflected on pages C7-C8b of your TSCA Guide. See 89 FR 12248.¹

- 3) **Asbestos Ban.** On March 18, 2024, EPA announced a final rule to prohibit the ongoing uses of chrysotile asbestos. Chrysotile asbestos is the only known form of asbestos still being used in or imported into the United States. It is used primarily in asbestos diaphragms, sheet gaskets, brake blocks, aftermarket automotive brakes/linings, other vehicle friction products, and other gaskets. Chrysotile asbestos was most recently imported to the US in 2022 for use in the chlor-alkali industry as primarily asbestos diaphragms. Eight chlor-alkali facilities still used asbestos diaphragms and EPA is requiring they transition to non-asbestos technology within five years, though two specific facilities have been granted longer compliance deadlines. This rule is the first risk management rule to be finalized under the 2016 Lautenberg Amendments. EPA focused solely on chrysotile asbestos for this rule because it is the only asbestos fiber still in use. The new rule is reflected on pages R22-29 of your TSCA Guide. See 89 FR 21970.

Please also note these recent TSCA-related activities:

- **TSCA Section 21 Petition.** On January 4, 2024, the Washington Department of Ecology (WDOE) submitted a petition to EPA under TSCA Section 21 seeking a rulemaking “to safeguard public health against polychlorinated biphenyls (PCBs) in consumer products.” Specifically, WDOE requests EPA take the following actions:
 - “Commence rulemaking to reassess limits on allowable inadvertent PCBs found in consumer products. This specifically includes as detailed in the definitions of “excluded manufacturing process” and “recycled PCBs” found in 40 CFR 761.3.
 - Adopt a new rule that identifies use of pigments containing PCBs as a “use” of PCBs
 - In collaboration with state and tribal governments, establish new, lower limits on allowable inadvertent PCBs in consumer products. We suggest an eventual limit of zero, phased in over a ten-year period, along with identification of applicable test methods.
 - In collaboration with state and tribal governments, establish priority consumer products that will be subject to lower allowable limits of inadvertent PCBs at an earlier date. We suggest these lower limits could initially apply to paints and inks, with an effective date for zero PCBs within five years. We also suggest pigments should be subject to an earlier effective date for zero PCBs within of [sic] seven years.

¹ We recognize that the extended deadline has passed as of the print date of this update. We are including it, however, because the extension is reflected in the associated regulations and constitutes a final rule. Including in this update ensures that your TSCA Guide is fully updated with the latest regulations, even if they are no longer relevant.

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- In collaboration with state and tribal governments, reassess limits on allowable PCBs found in commercial products, as detailed in 40 CFR 761, et seq., and establish a rulemaking schedule for the adoption of revised regulations.”

EPA is statutorily obligated to respond by April 3, 2024. More information, including the petition, can be found at <https://www.epa.gov/system/files/documents/2024-01/jan-4-2024-letter-to-michael-regan-epa-and-pcb-petition.pdf>.

- **New Eye Irritant Framework.** On January 8, 2024, EPA announced a new framework for identifying eye irritation and corrosion hazards for new chemicals evaluated under TSCA. In the past, testing for eye irritants and corrosion hazards were conducted on live rabbits. The data gathered from such tests was inconsistent, however, especially for mild to moderate irritation. The new framework will place increased emphasis on non-animal testing methods that are more reproducible and more applicable to humans. EPA has placed an emphasis on increasing efficiency in new chemical review and on decreasing animal testing, and this new framework will accomplish both goals. EPA also anticipates this new framework will decrease costs for stakeholders as animal testing will no longer be required. See 89 FR 1093.
- **Inactive PFAS.** On January 8, 2024, EPA finalized a significant new use rule (“SNUR”) barring companies from starting or resuming the manufacture or processing of 329 per- and poly-fluoroalkyl (“PFAS”) that have not been made or used in many years, so-called “inactive” PFAS, without a complete EPA review and risk determination.² When TSCA was first passed in 1976, chemicals then existing in commerce were grandfathered in and not subject to further EPA review. And in the first forty years of TSCA, EPA reviewed only approximately 20% of new chemicals and was hampered by its statutory authority (or lack thereof) to address new chemicals about which it had insufficient information. That changed in 2016 with the Lautenberg Amendments, which authorized, and indeed required, EPA to review all new chemicals before they enter commerce. Further, TSCA requires, as part of the TSCA inventory, EPA to designate chemicals as either “active” or “inactive” in commerce, with the latter meaning that the chemical substance has not been manufactured (including imported) or processed in the United States since June 21, 2006. This final SNUR applies to all PFAS that are currently listed as “inactive” on the TSCA Inventory and not subject to another significant new use rule. If any company wants to use any of the 329 inactive PFAS, under this final rule they must notify EPA first and EPA must then conduct a “robust review of health and safety information . . . to determine if the new use may present unreasonable risk to human health or the environment and put any necessary restrictions in place before the use could restart.” This final rule was first

² Part 721 Subpart E- Significant New Uses for Specific Chemical Substances section is no longer within the printed 6-Volume set of the TSCA Guide but is available in full on our website. While we do not typically include SNURs in this quarterly letter, we are including this specific SNUR because of EPA’s specific recent focus on PFAS.

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proposed on January 26, 2023 (88 FR 4937) and EPA received 20 public comments. Of note, one comment claimed its use of an affected PFAS chemical was ongoing and thus that PFAS chemical was not subject to this rule. This comment also submitted information confidentially to EPA to support that claim. EPA reviewed the information and determined that the manufacture was not ongoing, and that specific PFAS chemical was not excluded from the final rule. The complete list of PFAS chemicals subject to this rule can be found at 40 CFR § 721.11777(b)(i)-(iii). The final rule is effective immediately, though for judicial review purposes it is promulgated at 1 PM EST on January 25, 2024. See 89 FR 1822.

- **PFAS TRI Reporting.** On January 9, 2024, EPA announced the automatic addition of seven per- and polyfluoroalkyl substances (PFAS) to the list of chemicals subject to Toxic Release Inventory (TRI) reporting. Six of those seven PFAS were automatically added pursuant to the 2020 National Defense Authorization Act (NDAA), which requires EPA to add individual PFAS to the TRI list once EPA had finalized a toxicity value for that individual PFAS. The six automatically added are: Ammonium perfluorohexanoate, Chemical Abstract Service Registration Number (CASRN) 21615-47-4; Lithium bis[(trifluoromethyl)sulfonyl] azanide, CASRN 90076-65-6; Perfluorohexanoic acid (PFHxA), CASRN 307-24-4; Perfluoropropanoic acid (PFPrA), CASRN 422-64-0; Sodium perfluorohexanoate, CASRN 2923-26-4; and 1,1,1-Trifluoro-N-[(trifluoromethyl)sulfonyl] methanesulfonamide, CASRN 82113-65-3.

Additionally, under the NDAA, EPA was required to review confidential business information (CBI) claims prior to adding any PFAS to the TRI list. One of the PFAS specifically identified for addition to the TRI list by the NDAA was subject to such a CBI claim. However, the identity of the chemical was subsequently declassified in the TSCA Inventory in 2023 and is now being added to the TRI list: Betaines, dimethyl(.gamma.-.omega.-perfluoro-.gamma.-hydro-C8-18-alkyl), CASRN 2816091-53-7. Reporting obligations for these seven PFAS, for facilities subject to reporting requirements, began on January 1, 2024, and should be included on reporting forms due by July 1, 2025. More information can be found at <https://www.epa.gov/newsreleases/epa-requires-toxics-release-inventory-reporting-seven-additional-pfas>.

- **EPA Information Collection Activities.** On January 17, 2024, EPA published for public review an information collection request (ICR) it planned to submit to the Office of Management and Budget (OMB). The request is titled “Formaldehyde Standards for Composite Wood Products Act.” This is a proposed renewal of an already existing ICR, scheduled to expire on September 30, 2024. This ICR covers the reporting and recordkeeping requirements for all regulations related to accreditation bodies and third-party certifiers that wish to participate in the third-party certification program. See 89 FR 2946.

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- **EPA Information Collection Activities.** On January 29, 2024, EPA announced the availability of an information collection request (ICR) it planned to submit to the Office of Management and Budget (OMB). The request is titled “Regulation of Persistent, Bioaccumulative, and Toxic Chemicals under TSCA Section 6(h).” This is a proposed renewal of an already existing ICR, scheduled to expire on January 31, 2024. This ICR covers information collection activities associated with the restrictions and prohibitions on the five PBT chemicals for which rulemakings have taken place or are in process: decabromodiphenyl ether (decaBDE) (Chemical Abstract Services Number (CASRN) 1163–19–5), phenol, isopropylated phosphate (3:1) (PIP (3:1)) (CASRN 68937–41–7), 2,4,6 tris(tert-butyl)phenol (2,4,6-TTBP) (CASRN 732–26–3), pentachlorothiophenol (PCTP) (CASRN 133–49–3), and hexachlorobutadiene (HCBD) (CASRN 87–68–3). *See* 89 FR 5531.

- **6PPD Draft Testing Method.** On January 30, 2024, EPA published a draft testing method (EPA Method 1634) to enable the detection of 6PPD-quinone in storm and surface waters, though the method is not yet approved in 40 CFR Part 136. As reported in the January 2024 Update, on November 2, 2023, EPA announced it was granting the TSCA Section 21 petition of several native Tribes to address the uses of the chemical N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylenediamine, better known as 6PPD, in tires. 6PPD is commonly used in tires to slow breakdown during their lifespan. The Tribes had argued that a 6PPD byproduct, 6PPD-quinone, was lethal to salmon and other aquatic organism populations. EPA believes that addressing the presence of 6PPD and its byproducts in the environment will help reverse the declining populations of several aquatic species. EPA anticipates publishing a notice of proposed rulemaking under TSCA Section 6 by Fall 2024 to gather more information that may inform a potential final rule. EPA also plans to finalize a rule under TSCA Section 8(d) requiring manufacturers to report lists and unpublished health and safety studies to EPA by the end of 2024. EPA has created a 6PPD specific website to keep the public informed of the rulemaking progress. That website can be accessed at <https://www.epa.gov/chemical-research/6ppd-quinone>. The draft method and other information, including the research summary of the single laboratory validation study, can be found at <https://www.epa.gov/cwa-methods/6ppd-q-using-liquid-chromatography-tandem-mass-spectroscopy-lcmsms-method-1634-not-yet>.

- **EPA Information Collection Activities.** On February 1, 2024, EPA announced the availability of an information collection request (ICR) it planned to submit to the Office of Management and Budget (OMB). The request is titled “Chemical-Specific Rules under the Toxic Substances Control Act (TSCA) Section 8(a); Certain Nanoscale Materials.” This is a proposed renewal of an already existing ICR, scheduled to expire on September 30, 2024. This ICR covers the reporting and recordkeeping requirements for persons who manufacture or process chemical substances as nanoscale materials under the authority of TSCA Section 8(a). *See* 89 FR 6520.

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- **Fall 2023 Unified Agenda.** On February 9, 2024, EPA published its semiannual Agenda of Regulatory and Deregulatory Actions for Fall 2023 (“Agenda”). This document contains information about under development regulations, completed regulations, or cancelled regulations since the last agenda, as well as a review of regulations with small business impacts. As it relates to TSCA, and among other noted TSCA related actions, the Agenda highlights, individually, proposed rules under TSCA regarding 1-bromopropane (1-BP), trichloroethylene, N-methylpyrrolidone (NMP), and C.I. Pigment Violet 29, and final rules regarding methylene chloride and perchloroethylene. EPA also expects that several TSCA-related items, while under development, will not be completed or have regulatory action within the next 12 months:
 - Lead; Renovation, Repair, and Painting Program for Public and Commercial Buildings;
 - 1,4-Dioxane; Regulation Under TSCA;
 - Reconsideration of the Definition of Lead-Based Paint; and
 - Toxics Release Inventory (TRI) Articles Exemption Clarification Rule

More information, including the entire Agenda, can be found at www.reginfo.gov.

- **PFAS Data Lawsuit.** On February 15, 2024, two environmental groups, Public Employees for Environmental Responsibility and the Center for Environmental Health, filed a lawsuit in the United States District Court for the District of Columbia accusing EPA of withholding test data on the presence of PFAS in fluorinated plastic containers. In January 2023, the groups had, via a Freedom of Information Act (FOIA) request, sought data and information on the health risks associated with PFAS in fluorinated containers. According to the groups, EPA issued four interim responses to the FOIA request, including releasing redacted PFAS test results. However, the groups allege that EPA still has to produce hundreds of responsive documents. The groups allege that the redacted material is not subject to CBI protection under TSCA, despite being claimed as such by Inhance Technologies LLC (the only U.S. manufacturer of fluorinated containers), and thus cannot be withheld under FOIA exemptions. The case is Public Employees for Environmental Responsibility, et al. v. EPA, Case No. 24-00445.
- **TSCA Inventory.** On February 20, 2024, EPA announced the release of the latest TSCA Inventory (“Inventory”). The Inventory is a list of all chemicals manufactured, processed, or imported into the United States, and is updated biannually. New updates to the Inventory include new commercial activity data, unique identifier data, and regulatory flags, such as significant new use rules. Importantly, this update includes approximately 900 substances that are now listed with their unique chemical identities after having been removed from the confidential portion of the Inventory. EPA encourages all persons submitting information to the Inventory to regularly check the Central Data Exchange (CDX) for communications relating to submissions, as many of the communications are

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time-sensitive. More information and the Inventory can be found at <https://www.epa.gov/tsca-inventory>.

- **Chemical Exposure Action Map.** On February 22, 2024, the Environmental Defense Fund (“EDF”) published their Chemical Exposure Action Map (“Map”). EDF hopes the Map will spur EPA to “transform the assessment of risks posed by toxic chemicals in our communities.” The Map intends to be a comprehensive view, as opposed to individual chemical specific view, to highlight the cumulative risks posed by multiple chemicals interacting together in communities. This is in contrast to EPA’s typical practice of, according to EDF, looking at exposure risks of chemicals in isolation during TSCA risk assessments. The Map can be accessed at <https://chemicalactionmap.edf.org/>.
- **Access to CBI.** On February 26, 2024, EPA announced that it authorized contractor Aventi Corporation of Alexandria, VA, to access information submitted to EPA under all sections TSCA. Some of this information may have been claimed as confidential business information (“CBI”) by the submitting entity. Access to TSCA data will continue through at least October 31, 2026, when the initial contract expires. Access may continue for as long as the contract is renewed, if it is renewed, without Federal Register notice. Aventi personnel will be required to sign nondisclosure agreements. See 89 FR 14067.
- **TSCA Settlement.** On March 6, 2024, EPA announced a settlement with Haifa North America, Inc. (“Haifa”), of Altamonte Springs, Florida, requiring Haifa to pay \$664,267 for violations of TSCA’s chemical data reporting regulations. EPA alleged that Haifa failed to submit required reports for 32 chemical substances Haifa imported between 2016 and 2019. TSCA requires companies to provide EPA information on the chemicals they for commercial purposes, manufacture, process, or import. The settlement is intended to resolve Haifa’s alleged violations. More information can be found at <https://www.epa.gov/newsreleases/epa-settlement-haifa-north-america-altamonte-springs-florida-resolves-alleged-tsca>.
- **EPA Budget.** On March 11, 2024, the Biden Administration proposed a 20% increase in EPA’s budget for fiscal year 2025. Notably, the proposed budget includes as a 2025 priority “Ensuring the Safety of Chemicals for People and the Environment”, and proposes \$131.9 million and 545 full-time employees for the TSCA program, increases of \$49 million and 174 employees, respectively, above 2024 levels. Additionally, in fiscal year 2025, “EPA expects to conduct risk assessments and make affirmative determinations on risks for more than 500 new chemical notice and exemption submissions.”
- **Proposed Mandamus Settlement Agreement.** On March 13, 2024, EPA announced a proposed settlement agreement addressing a petition for writ of mandamus filed by the Ecology Center, the Center for Environmental Health, United Parents Against Lead & Other Environmental Hazards, and the Sierra Club (collectively, “Petitioners”) in the

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United States Court of Appeals for the Ninth Circuit: *Ecology Center, et al. v. U.S. EPA*, Case No. 23–70158. On August 26, 2009, EPA granted a TSCA Section 21 petition from Petitioners and other organizations/individuals requesting that EPA “establish regulations prohibiting the manufacture, processing, and distribution in commerce of lead wheel balancing weights”. Petitioners filed the petition for a writ of mandamus on August 22, 2023, arguing that EPA’s delay in acting pursuant to the 2009 petition was a violation of the Administrative Procedure Act and requesting an order compelling EPA to issue a final rule within six months of the Court’s order. In the settlement, EPA agreed to, by December 31, 2024, either issue a proposed rule regulating lead wheel weights or sign a determination not to proceed with a rulemaking regulating lead wheel weights. Two weeks after announcing the settlement, on March 27, 2024, EPA sought public input on potential exposure routes to lead from lead wheel weights. Those comments can be found on docket EPA-HQ-OPPT-2024-0085. The settlement agreement can be found at <https://www.regulations.gov/document/EPA-HQ-OGC-2024-0112-0002>.

- **Access to CBI.** On March 15, 2024, EPA announced that it authorized contractor ICF Inc of Fairfax, VA, and ten ICF’s subcontractors, to access information submitted to EPA under all sections TSCA. Some of this information may have been claimed as CBI by the submitting entity. Access to TSCA data will continue through at least November 30, 2027, when the initial contract expires. Access may continue for as long as the contract is renewed, if it is renewed, without Federal Register notice. Personnel of the contractors and subcontractors will be required to sign nondisclosure agreements. *See* 89 FR 18935.
- **Formaldehyde Draft Risk Evaluation.** On March 15, 2024, EPA released the draft TSCA risk evaluation for formaldehyde. EPA’s preliminary finding in the draft risk evaluation is that formaldehyde poses an unreasonable risk to human health. EPA notes that formaldehyde is relatively ubiquitous in human life, in part because humans and animals produce and release formaldehyde, and people are routinely exposed to it. The draft risk evaluation evaluated the risks posed by formaldehyde both from the production and use of products subject to TSCA and from other source exposures. EPA noted the challenge to evaluating formaldehyde risks because of the mixing of releases from commercial activities and natural sources, but EPA was still able to sufficiently evaluate all 62 conditions of use. EPA did not identify a risk to the environment from formaldehyde that would contribute to the unreasonable risk determination. *See* 89 FR 18933.
- **TRI Data.** On March 21, 2024, EPA its 2022 Toxic Release Inventory (“TRI”) National Analysis (“Analysis”). The Analysis showed that releases of TRI chemicals from facilities covered by the program declined by 21% from 2013 to 2022, though releases increased by 1% from 2021 to 2022. Additionally, facilities reported managing 85% of their TRI waste through preferred practices, which include recycling, energy recovery, and treatment, while releasing 11.5% of their TRI waste into the environment. Analysis details and further information can be found at <https://www.epa.gov/trinationalanalysis>.

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- **Fifth Circuit Decision.** On March 21, 2024, the Fifth Circuit Court of Appeals issued a decision in the case *Inhance Technologies, L.L.C., v. United States Environmental Protection Agency*, Case No. 23-60620. In December 2023, EPA issued two orders under Section 5(f) and 5(e) of TSCA prohibiting Inhance from manufacturing or processing PFAS during its fluorination process. Inhance argued that EPA exceeded its statutory authority by issuing orders under TSCA Section 5 and not Section 6 because Inhance’s fluorination process was not a “significant new use”, at least in part because Inhance has been using the same process for over forty years. The Fifth Circuit agreed. Specifically, the court looked at the Federal Register notice for the proposed PFAS Significant New Use Rule (“SNUR”), which “designat[ed] as a significant new use manufacturing . . . or processing of an identified subset of [PFAS] for any use that will not be ongoing after December 31, 2015, and all other [PFAS] for which there are currently no ongoing uses” and contained no reference to the fluorination industry in the list of potentially affected industries. 80 Fed. Reg. 2885 (Jan. 21, 2015). The Federal Register notice for the final SNUR likewise contained no reference to the fluorination industry. 85 Fed. Reg. 45109 (July 27, 2020). Focusing in on the ordinary meaning of the word “new”, which the court believed more closely aligned with the text of the statute, and Inhance’s lack of knowledge that the 2020 SNUR would apply to it (neither Inhance nor EPA knew that the fluorination process produced PFAS in 2020), the court vacated EPA’s December 2023 Section 5 orders to Inhance. It is unclear at this time how EPA plans to respond or what EPA’s next move will be, as EPA has maintained a regulatory focus on Inhance in recent years. EPA and Inhance are also involved in at least one other lawsuit, as the United States filed an enforcement action in the United States District Court for the Eastern District of Pennsylvania in December 2022 after Inhance refused to comply with a March 2022 Notice of Violation. See Complaint, *United States v. Inhance Techs. LLC*, 5:22-cv-05055, 2022 WL 17903769 (E.D. Pa. Dec. 19, 2022).
- **PFAS Testing Orders.** On March 25, 2024, EPA issued the fourth TSCA test order for testing of PFAS under the National PFAS Testing Strategy. This specific test order requires the 3M Company and Wacker Chemical Corporation to “conduct and submit testing on the physical-chemical properties of 2-(N-Methylperfluoro-1-octanesulfonamido)ethanol (NMeFOSE) (CASRN: 24448-09-7), including testing on the health effects following inhalation of this chemical.” NMeFOSE is common in everyday products, including clothing, carpet treatments, and furniture coatings. Studies have shown that NMeFOSE can accumulate in indoor air and dust, and outdoors in various environmental media. EPA has concluded that NMeFOSE may pose an unreasonable risk of injury to health or the environment, and the test order is intended to assist EPA in quantifying those risks. EPA also believes the test order will help it understand the risks associated with 100 structurally similar PFAS, increasing knowledge of that category of PFAS generally. Companies subject to TSCA test orders must either conduct the required testing or provide EPA with existing data not identified by EPA but which the test order recipient

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believes meets the requirements of the test order. As required by TSCA, the test order requires a tiered testing process, with the first testing due by March 25, 2025. The data submitted by that date will inform which additional testing is needed. More information, including the test order, can be found at <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/list-chemicals-subject-section-4-test-orders>.

- **Unpublished Health and Safety Data Rule.** On March 25, 2024, EPA announced a proposed rule under TSCA Section 8(d) that would require manufacturers, including importers, of 16 specific chemical substances to report to EPA the data from unpublished health and safety studies. Manufacturers would also be required to submit unpublished data concerning environmental effects and potential population/subpopulation exposures to these chemicals. Of those 16 chemicals, 13 are included in the 2014 TSCA Work Plan, a list of chemicals requiring further study based on their potential hazards and exposures. Further, five of the chemicals subject to this proposed rule were proposed for prioritization in December 2023 and 10 others were candidates for prioritization in December 2023 and are still being considered for prioritization in December 2024. The list of chemicals subject to this proposed rule are:

- 4,4'-Methylene bis(2-chloroaniline) (MBOCA) (CASRN 101-14-4)
- Acetaldehyde (CASRN 75-07-0)
- Acrylonitrile (CASRN 107-13-1)
- Benzenamine (CASRN 62-53-3)
- Vinyl Chloride (CASRN 75-01-4)
- 4-tert-octylphenol(4-(1,1,3,3-Tetramethylbutyl)-phenol) (CASRN 140-66-9)
- Benzene (CASRN 71-43-2)
- Bisphenol A (CASRN 80-05-7)
- Ethylbenzene (CASRN 100-41-4)
- Hydrogen fluoride (CASRN 7664-39-3)
- N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylenediamine (6PPD) (CASRN 793-24-8)
- Naphthalene (CASRN 91-20-3)
- Styrene (CASRN 100-42-5)
- Tribromomethane (Bromoform) (CASRN 75-25-2)
- Triglycidyl isocyanurate (CASRN 2451-62-9)
- 2-anilino-5-[(4-methylpentan-2-yl) amino]cyclohexa-2,5-diene-1,4-dione (6PPD-quinone) (CASRN: 2754428-18-5)

The inclusion of 6PPD and 6PPD-quinone is notable because EPA granted a TSCA Section 21 petition in the fall of 2023 and agreed to address the use of 6PPD in tires. One of the steps EPA agreed to take in granting that petition was to issue a TSCA Section 8(d) rule for

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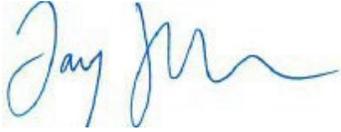
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unpublished health and safety studies by the end of 2024. If the rule becomes final, reporting would be required within 90 days of the publication of the final rule. See 89 FR 20918.

Best regards,



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