Dear Subscriber,

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

1) **Methylene Chloride Compliance Guide.** On July 10, 2024, EPA announced the issuance of a compliance guide for the methylene chloride risk management rule. As you may recall, on April 30, 2024, EPA announced a final risk management rule banning most uses of methylene chloride. This new compliance guide is intended to help potentially regulated entities determine what their obligations may be under the rule. For example, the guide provides detailed information on the workplace chemical protection program requirements, reporting and recordkeeping requirements, and downstream notification requirements. This guide can be found on pages R4i-R4bc of your TSCA Guide.

2) **PCB Waste Manifests.** On July 26, 2024, EPA announced a final rule amending certain hazardous waste manifest regulations. This Federal Register notice primarily concerns amendments to Resource Conservation and Recovery Act (RCRA) regulations, but EPA also finalized "conforming" amendments to TSCA manifest regulations for polychlorinated biphenyls (PCBs) wastes. Generally, the amendments relate to regulated entities documentation obligations and clarify the ability to use electronic manifests and the e-Manifest system for PCB waste tracking and recordkeeping requirements. Such changes include, but are not limited to, 40 CFR 761.215(c), which now requires that a facility receiving PCB waste must submit a Discrepancy Report to the e-Manifest system in lieu of submitting written reports to the Federal or State regulatory agencies, and 40 CFR 761.216, which now requires all Unmanifested Waste Reports for PCB waste be submitted electronically through the e-Manifest system. Removing the words "written", "handwritten", and "by hand" from the PCB regulations further clarifies regulators' preference for regulated entities to utilize the e-Manifest system. Some reporting obligations, such as the Exception Report requirements under 40 CFR 761.217(a)(1), can still be conducted through postal mail. Different reporting obligations are required to be submitted through the e-Manifest system, such as the Discrepancy reports mentioned above. Additional amendments include technical corrections and rectifying typographical errors. We encourage all stakeholders to carefully review these new reporting options

and obligations. The updated rule can be found on pages B9-B90k of your TSCA Guide. *See* 89 FR 60692.

3) **PFAS Reporting Delay.** On September 4, 2024, EPA announced a delay to the start of PFAS data reporting under TSCA. EPA finalized the rule in October 2023, which was issued under TSCA Section 8(a)(7) and required by The National Defense Authorization Act for Fiscal Year 2020. Section 8(a)(7) requires persons who manufactured or imported PFAS or PFAS-containing articles for commercial purposes at any time since January 1, 2011, to conduct certain reporting and recordkeeping activities for each year since January 1, 2011. While the reporting period was to begin on November 12, 2024, EPA has announced that it will now begin on July 11, 2025, and run through January 11, 2026, for most reporters. However, small businesses reporting data solely on importing PFAS-containing articles will have until July 11, 2026, to submit reports. EPA is delaying the reporting period due to "constraints on the timely development and testing of the software being developed to collect information pursuant to this reporting rule (i.e., the rule's reporting application)." EPA intends to collect an "unprecedented" amount of data via the rule and, due to budget constraints, was only able to commit resources to developing the necessary data collection tool necessary in May 2024. The updated rule can be found on pages N11 and N16 of your TSCA Guide. *See* 89 FR 72336.

4) **Chemical Data Reporting Deadline.** On September 20, 2024, EPA announced it was extending the submission deadline for 2024 Chemical Data Reporting (CDR) reports to November 22, 2024. This extension is at least partially in response to technical issues with the 2024 reporting tool. Specifically, there were issues relating to the tool's ability "to correctly capture substantiations for chemical identity confidential business information (CBI) claims across multiple chemicals." The extension applies only to the 2024 submission period. The updated rule can be found on page B53 of your TSCA Guide. *See* 89 FR 79150.

5) **Your TSCA Guide includes copies of certain EPA TSCA guidance. We have audited the guidance documents and are including the following pieces of updated EPA guidance:**

- Reporting Requirements for the Mercury Inventory of the Toxic Substances Control Act
- Notification of PCB Activity Form 7710-53

Please also note these recent TSCA-related activities:

- **1,1-DCE Risk Evaluation.** On July 1, 2024, EPA released its draft risk evaluation for 1,1-dichloroethane and a draft human health hazard assessment for 1,2-dichloroethane. Both

of these chemicals have similar physical structures but are used differently in commerce and are being evaluated separately by EPA. 1,2-dichloroethane has been better studied over the years, and because of the structural, physical, chemical, metabolic, cancer and non-cancer toxicological similarities between the two chemicals, EPA utilized data on the toxicity of 1,2-dichloroethane to fill gaps in the understanding of the toxicity of 1,1-dichloroethane for its draft risk evaluation. The draft risk evaluation of 1,1-dichloroethane found that "exposure to 1,1-dichloroethane may increase the risk of kidney and other cancers, as well as harmful non-cancer renal, nasal, immune system, and reproductive effects to workers." However, "EPA preliminarily found no unreasonable risk to the general population from breathing air where 1,1-dichloroethane was released from facilities or ingesting drinking water or surface water or soil from 1,1-dichloroethane disposed to land (i.e., direct disposal to landfills or land applied biosolids from public wastewater treatment works treating 1,1-dichloroethane-containing wastewater)", and "found no unreasonable risk to potentially exposed and susceptible subpopulations, which included infants exposed to drinking water during formula bottle feeding, subsistence and tribal fishers, pregnant women and people of reproductive age, and individuals with compromised immune systems or neurological disorders." Additionally, EPA found that chronic exposure to 1,1-dichloroethane by aquatic organisms poses an unreasonable risk of injury, acute exposure did not pose an unreasonable risk to those same aquatic organisms. *See* 89 FR 54815.

- **Vacated Test Orders.** On July 5, 2024, the U.S. Court of Appeals for the District of Columbia vacated seven March 2022 TSCA Section 4(a)(2) test orders. EPA had issued the test orders to seven different chemical manufacturers and processors of 1,1,2-trichloroethane, requesting testing of its effects on the reproductive systems of birds. Vinyl Institute Inc., a trade group, challenged the test orders, arguing that EPA had failed to meet its burden showing the need for the test orders. The D.C. Circuit ruled, in the case *Vinyl Institute Inc. v. EPA* (Case. No. 22-1089), that EPA partly relied on non-public information (information only disclosed once the litigation began) in justifying the need for the testing, and that EPA did not adequately explain how public information guided its decision to require testing. Additionally, the D.C. Circuit rejected the Vinyl Institute's TSCA Section 19(b) motion (a motion supplement the administrative record with a scientific consultant's report) because EPA can consider information from test order recipients and extinguish test orders after test orders have been issued, and Vinyl Institute failed to provide the report to EPA in response to the test order. As such, there was no reasonable grounds for Vinyl Institute's delay in submitting the report and the motion under TSCA Section 19(b) was denied.

- **New SACC Members.** On July 8, 2024, EPA announced the appointment of four new members, and the reappointment of six current members, to the Science Advisory

Committee on Chemicals (SACC). Members of SACC serve three-year terms, staggered among the 18 total members. Appointed members have diverse scientific expertise and backgrounds, bringing differing scientific viewpoints to SACC's work. SACC "serves as a scientific peer review mechanism of EPA's Office of Chemical Safety and Pollution Prevention. It provides independent scientific advice and recommendations to EPA on the scientific basis for risk assessments, methodologies and pollution prevention measures and approaches for chemicals regulated under TSCA." More information on the new appointments can be found at https://www.epa.gov/tsca-peer-review/members-science-advisory-committee-chemicals.

- **PFAS Petition.** On July 11, 2024, EPA granted a TSCA Section 21 petition filed by the Public Employees for Environmental Responsibility, the Center for Environmental Health, and other environmental and health advocates, requesting EPA prohibit the manufacture of fluorinated plastic containers. As reported several times over the past few years, EPA has been engaged in a long-standing dispute with Inhance Technologies, LLC (Inhance) over Inhance's manufacturing process for fluorinated plastic containers and the PFAS generated therein. On March 21, 2024, in *Inhance Technologies, L.L.C., v. United States Environmental Protection Agency*, Case No. 23-60620, the Fifth Circuit Court of Appeals vacated two EPA orders issued to Inhance under Section 5(f) and 5(e) of TSCA that prohibited Inhance from manufacturing or processing PFAS during its fluorination process. The Fifth Circuit did recognize that EPA maintained authority to regulate the manufacturing process under TSCA section 6, and the TSCA section 21 petition filed here is a direct response to that Fifth Circuit decision. EPA's response to the petition stated that EPA would "promptly commence an appropriate proceeding under TSCA Section 6." Specifically, EPA stated that "[a]s part of that proceeding, the EPA intends to request information, including the number, location, and uses of fluorinated containers in the United States; alternatives to the fluorination process that generates PFOA, PFNA, and PFDA; and measures to address risk from PFOA, PFNA, and PFDA formed during the fluorination of plastic containers."

- **PFAS Lawsuit.** On July 25, 2024, Public Employees for Environmental Responsibility (PEER) and the Center for Environmental Health (CEH) filed a lawsuit against EPA in the U.S. District Court for the District of Columbia alleging that EPA has failed to perform non-discretionary duties under TSCA Section 4(f). As noted in the July 2024 Update of your TSCA Guide, on May 17, 2024, PEER and CEH filed a notice of intent to sue (NOI) EPA regarding PFAS containing plastic containers. PEER and CEH alleged that EPA has abandoned its legal obligation under TSCA Section 4(f) to abate the risks to human health posed by fluorinated plastic containers manufactured by Inhance Technologies, LLC, and sought to force EPA to prohibit the manufacture and distribution of those plastic containers. PEER and CEH's lawsuit seeks a court order setting an "expeditious" deadline

for a rule under TSCA Section 6 prohibiting the production of PFAS during the fluorination of plastic containers. The lawsuit is captioned *Center for Environmental Health and Public Employees for Environmental Responsibility v. Regan*, Case No. 24-2194.

- **Proposed High-Priority Substances.** On July 24, 2024, EPA proposed designating five chemicals as High-Priority Substances for risk evaluation under TSCA. The five chemicals proposed are:
  - Vinyl Chloride (CASRN 75-01-4)
  - Acetaldehyde (CASRN 75-07-0)
  - Acrylonitrile (CASRN 107-13-1)
  - Benzenamine (CASRN 62-53-3)
  - 4,4'-methylene bis(2-chloroaniline) (MBOCA) (CASRN 101-14-4)

  If the designation as High-Priority Substances is finalized, EPA would immediately begin the risk evaluation process on those five chemical substances and would be required to complete that process within 3.5 years. EPA had previously identified these chemicals in the 2014 TSCA Work Plan, which is a list of chemicals identified for further assessment based on their hazards and potential for exposure, and initiated the prioritization process for these five chemicals in December 2023. 88 FR 87423. EPA has included in each chemical substance's docket the information, analysis and basis used to support the proposed designation. *See* 89 FR 60424.

  As reported in your January 2024 Update letter, in December 2019, EPA designated 20 High-Priority Substances pursuant to TSCA Section 6(b)(2)(B). Each of those substances is either currently undergoing risk evaluation or has completed its risk evaluation, and EPA expects to complete approximately five risk evaluations annually over the next few years. Additionally, TSCA Section 6(b)(3)(C) requires EPA to designate a replacement High-Priority Substance when the risk evaluation for another High-Priority Substance is complete. Thus, EPA is proactively seeking to designate new High-Priority Substances in anticipation of completing more risk evaluations in the coming year. EPA selected the five chemicals listed above largely in line with public guidance, "A Working Approach for Identifying Potential Candidate Chemicals for Prioritization", released to the public on September 27, 2018, available at https://www.epa.gov/sites/production/files/201809/documents/preprioritization_white_paper_9272018.pdf.

- **2023 TRI Data.** On July 30, 2024, EPA announced the availability of Toxic Release Inventory (TRI) data from calendar year 2023. The data was collected from more than 20,000 facilities across the country and includes 21 new chemicals not previously part of

TRI data collection. The 2023 data can be found at https://www.epa.gov/toxics-release-inventory-tri-program/tri-preliminary-dataset.

- **1-BP Ban.** On July 31, 2024, EPA announced a proposed rule under TSCA Section 6(a) banning most consumer uses, and some workplace uses, of 1-bromopropane (1-BP) (CASRN 106-94-5). EPA determined that 1-BP presents an unreasonable risk of injury to health due to significant adverse health effects associated with exposure. TSCA requires that EPA address unreasonable risks to human health or the environment through rules designed to eliminate or mitigate such risks. In the case of 1-BP, the proposed rule bans all consumer uses, except in insulation, due to serious risks associated with skin, lung and intestinal cancers, reduced fertility, and damage to the liver, kidneys, and nervous system. 1-BP's use in insulation is exempt from this rule because EPA determined that such a use does not contribute to human health risks. Additionally, the proposed rule requires specific workplace controls and protections for workers for uses that are not banned under the rule. According to EPA, the proposed rule

  > "(i) Prohibit[s] the manufacture (including import), processing, and distribution in commerce of 1–BP for all consumer uses (excluding insulation for building and construction materials);
  > (ii) Prohibit[s] the manufacture (including import), processing and distribution in commerce of 1–BP for four industrial and commercial uses;
  > (iii) Require[s] strict workplace controls, including a 1–BP Workplace Chemical Protection Program (WCPP), which would include requirements to meet an inhalation exposure concentration limit, or seven occupational conditions of use of 1–BP;
  > (iv) Require[s] the use of prescriptive controls for six occupational conditions of use of 1–BP;
  > (v) Require[s] purchasers to provide sellers with a self-certification, which would document the purchaser's commitment to comply with the 1–BP WCPP, for six occupational conditions of use of 1–BP; and
  > (vi) Establish[es] recordkeeping and downstream notification requirements."

  The proposed rule also would prohibit industrial/commercial use of 1-BP in:
  - Adhesives and sealants;
  - Dry cleaning solvents, spot cleaners, and stain removers;
  - Coin and scissor cleaner (liquid spray, or aerosol cleaners; and
  - Other uses in arts, crafts, hobby materials (adhesive accelerant); automotive care products (engine degreaser, brake cleaner, refrigerant flush); anti-adhesive agents (mold cleaning and release product); functional fluids (closed/open-systems)—refrigerant/cutting oils.

EPA concluded the risk evaluation for 1-BP in August 2020 and issued a revised risk determination in December 2022. The proposed rule is intended to address the risks identified during those analyses. *See* 89 FR 65066.

- **SACC Meeting Minutes and Final Report.** On August 2, 2024, EPA announced the availability of meeting minutes and the final report from the May 20-23, 2024, SACC meeting regarding the 2024 Draft Risk Evaluation for formaldehyde. The Draft Risk Evaluation preliminarily found that formaldehyde posed an unreasonable risk to human health, and EPA sought peer review from SACC on EPA's data analyses and methodologies relevant to the conclusions within the Draft Risk Evaluation. SACC broadly concluded that "the draft documents are comprehensive and rely on the best available science," but identified five areas of potential improvements, including "aggregat[ing] exposure data to more accurately capture aggregate risks [and] incorporating National Academy of Sciences (NAS) comments related to formaldehyde effects". The meeting minutes and Final Report are available on docket EPA-HQ-OPPT-2023-0613.

- **Spring 2024 Unified Agenda**. On August 16, 2024, EPA published its semiannual Agenda of Regulatory and Deregulatory Actions for Spring 2024 (the "Agenda"). This document contains information about regulations under development, completed, or cancelled 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), N-methylpyrrolidone (NMP), and C.I. Pigment Violet 29, and final rules regarding trichloroethylene and perchloroethylene. More information, including the entire Agenda, can be found at www.reginfo.gov.

- **TSCA Consent Decree.** On August 28, 2024, EPA announced the Department of Justice had lodged a proposed consent decree with the United States District Court for the Southern District of New York in the lawsuit entitled *United States v. Legacy Builders/Developers Corp..*, Case No. 24 Civ. 6367. The Government had sought injunctive relief from Legacy Builder/Developers regarding unlawful work practices during renovations governed by the Renovation, Repair, and Painting Rule, 40 CFR part 745, subpart E. The proposed consent decree resolves all claims against Legacy Builders/Developers, requires a $168,000 payment to the United States, and imposes injunctive relief. *See* 89 FR 68931.

- **Draft DINP Risk Evaluation.** On August 30, 2024, EPA released its draft risk evaluation for diisononyl phthalate (DINP) (CASRN 28553-12-0). The draft risk evaluation preliminarily concluded that, among 45 evaluated conditions of use, only two industrial uses and one

consumer use significantly contribute to the unreasonable risk of DINP. The single consumer use contributing to an unreasonable risk is the use of DINP in "floor coverings and construction and building materials covering large surface areas, such as vinyl flooring, in-place wallpaper and carpet backing." The two industrial uses contributing to an unreasonable risk "involved unprotected workers using spray adhesives and sealants or paints and coatings that contain DINP with high-pressure sprayers." Additionally, EPA preliminarily concluded that DINP does not pose an unreasonable risk of injury to the general population or pose an unreasonable risk to the environment.

Notably, this draft risk evaluation was conducted at industry request pursuant to language contained in the 2016 Lautenberg Amendments, which permitted industry to request risk evaluations on chemical substances, provided the requestor pays a fee. The American Chemistry Council's High Phthalates Panel sought review of two phthalates, DIDP and DINP, in 2019. EPA published the draft risk evaluation for DIDP in May 2024 and released a portion of the DINP risk evaluation (a draft human health hazard assessment) at the same time. Both documents were reviewed by SACC from July 20 to August 1, 2024. But EPA has not seen the final SACC report on either chemical substance yet, so no feedback on the DINP report is incorporated into the draft risk evaluation released on August 30, 2024. *See* 89 FR 71270.

- **EPA Information Collection Activities.** On September 18, 2024, EPA announced the availability of an information collection request (ICR) it planned to submit to the Office of Management and Budget (OMB) titled "Toxic Chemical Release Reporting". This is a renewal of an already approved ICR, scheduled to expire on June 30, 2025. This ICR covers the reporting and recordkeeping requirements for manufacturers, processors, or users of chemicals substances above reporting threshold levels (as provided in 40 CFR 372.25) and the associated annual chemical release forms such person must submit to EPA. *See* 89 FR 76470.

- **TSCA Voluntary Remand.** On September 20, 2024, EPA filed a motion in *Cherokee Concerned Citizens v. EPA* (Case. No. 23-1096), a case in which the Petitioner had sought review of an Order for a New Chemical Substance under TSCA Section 5. EPA's motion states that it will withdraw the challenged order in part because it is unsure the decision contained in the order is correct, wishing instead to reconsider the position contained in the order. EPA stated that it overestimated the risk of allowing Chevron Corp. to create new plastic waste-based fuel chemicals. The Petitioner did not oppose EPA's request for remand but supports remand with vacatur.

- **Final TCEP Risk Evaluation.** On September 23, 2024, EPA released its final risk evaluation for Tris(2-chloroethyl) phosphate (TCEP). EPA has determined that this chemical

substance poses an unreasonable risk of injury to human health and the environment. This is the first risk evaluation finalized from the 20 High-Priority Substances designated in 2019. This risk evaluation incorporated recently announced improvements to the risk evaluation process, such as the April 23, 2024 final rule which made considerable changes to the risk evaluation process. *See* 89 FR 37028. The final risk evaluation determined that seven of the 21 conditions of TCEP use contribute significantly to the unreasonable risk to workers:

- Manufacturing imports;
- Paint and coating manufacturing;
- Polymers used in aerospace equipment and products;
- Aerospace equipment and produce and automotive articles and replacement parts containing TCEP;
- Paints and coatings for industrial use;
- Paints and coatings for commercial use; and
- Laboratory chemicals.

The unreasonable risks associated with TCEP use came primarily from inhalation and dermal exposures when workers handle and/or apply TCEP-containing liquids.

EPA also found unreasonable risk to consumers for three of 21 conditions of use:

- Fabric and textile products;
- Foam seating and bedding products; and
- Wood and engineered wood products.

Consumer risk was greatest when breathing in or ingesting dust from TCEP that comes off fabrics, textiles, foam or wood products. Additionally, unreasonable risks were present for people who consume large amounts of TCEP-contaminated fish. EPA also identified unreasonable risk to the environment, primarily to fish chronically exposed to TCEP. EPA will now move forward with a risk management rule to address identified unreasonable risks. *See* 89 FR 78868.

- **Vertebrate Animal Testing Report**. On September 24, 2024, the EPA released its Report on Statutory and Regulatory Requirements for Vertebrate Animal Testing and Flexibility for Implementing New Approach Methods (NAMs), which, in part, evaluates TSCA's requirements for animal testing and the statutory and regulatory flexibility provided for utilizing alternative testing methods. TSCA Section 4(a) authorizes EPA to require additional testing on chemical substances when, among other reasons, there is insufficient data on the risks associated with specific chemical substances. But TSCA Section 4(h) requires reducing and replacing, to the extent practicable, the use of vertebrate animals in testing and encourages the use of alternative test methods

whenever the information generated from those methods is "of equivalent or better" scientific quality as traditional vertebrate animal testing. To that end, TSCA Section 4(h)(2)(C) requires EPA to develop and update a list of scientifically reliable NAMs that do not involve vertebrate testing. The report concludes that EPA's "regulatory landscape indicates the environmental laws providing the Agency's authority are written broadly in most cases and the statutes do not generally preclude the use of scientific information or data from NAMs." The report can be found at https://www.epa.gov/system/files/documents/2024-09/epa-regulatory-review-report_final_508_0.pdf

- **TSCA Oral Argument.** On September 24, 2024, a three-judge panel for the United States Court of Appeals for the District of Columbia heard oral arguments regarding EPA's recently promulgated Confidential Business Information Claims Under the Toxic Substances Control Act rule (the "Rule"). The plaintiffs in the two cases, *American Chemistry Council et al. v. EPA*, Case. No. 23-1204, and *Environmental Defense Fund v. EPA*, Case No. 23-1166, both filed on November 8, 2023, took differing approaches to their challenges. The American Chemistry Council (ACC) argued that the Rule did not do enough to protect chemical identity confidentiality and that the Rule impermissibly exceeded EPAs authority under TSCA to compel disclosures. The Environmental Defense Fund (EDF), on the other hand, argued that the Rule violated TSCA's text by compelling too little disclosure and favoring withholding of information. According to observers, the judges seemed open to the ACCs challenge, grappling with situations where downstream importers could inadvertently, or possibly deliberately to gain a competitive advantage, waive or void an upstream company's CBI claim. Those same observers reported that the judges seemed skeptical of EDF's arguments.

- **Fluoride Decision.** On September 24, 2024, a California federal judge ruled that EPA's current "optimal" fluoride levels in drinking water pose an unreasonable risk of lowering children's IQ, though the court did not specify what action EPA should take to comply with the ruling. Plaintiffs sought to force EPA to issue a rulemaking under TSCA banning fluoride in drinking water. Recent studies suggest that fluoride is neurotoxic and poses specific dangers to children and the unborn. The judge, in his ruling, stated that TSCA's standard of review meant he owed no deference to EPA's position on fluoride and that EPA improperly ignored new and growing data on adverse health impacts associated with fluoride consumption. The case is titled *Food & Water Watch Inc. et al. v. Environmental Protection Agency et al.*, Case No. 3:17-cv-02162.

- **EPA Information Collection Activities.** On September 27, 2024, EPA provided notice that it submitted an information collection request (ICR) to the Office of Management and Budget (OMB) titled "Formaldehyde Standards for Composite Wood Products Act". This

is an extension of an already existing ICR, scheduled to expire on September 30, 2024. This ICR covers the reporting and recordkeeping requirements for manufacturers or processors of chemicals substances as nanoscale materials, as established under the authority of TSCA Section 8(a) and 40 CFR Part 704.20. *See* 89 FR 79583.

- **EPA Information Collection Activities.** On September 28, 2024, EPA provided notice that it submitted an information collection request (ICR) to the Office of Management and Budget (OMB) titled "Chemical-Specific Rules under the Toxic Substances Control Act; Certain Nanoscale Materials". This is an extension of an already existing ICR, scheduled to expire on September 30, 2024. This ICR covers the reporting and recordkeeping requirements associated with the TSCA Title VI and the implementing regulations in 40 CFR part 770 for Formaldehyde Emission Standards for Composite Wood Products. *See* 89 FR 79291.

- **PFAS Request for Comment.** On September 28, 2024, EPA requested public comment on the manufacture of certain PFAS, including perfluorooctanoic acid (PFOA), perfluorononanoic acid (PFNA), and perfluorodecanoic acid (PFDA), during the fluorination of plastic containers. The information gathered from public comments is intended to aid the EPA in further rulemaking under TSCA. This request for comment is in response to an April 11, 2023, TSCA Section 21 petition from the Public Employees for Environmental Responsibility, the Center for Environmental Health, and other environmental and health advocates, requesting that EPA immediately prohibit the manufacture of fluorinated plastic containers. That petition was granted on July 11, 2024. *See* 89 FR 79581.

Best Regards,

Larry Silver
