



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 01, 2024

Eve C. Gartner, Earthjustice
Liz Hitchcock, Toxic-Free Future
Judith Enck, Beyond Plastics
John Reeder, Environmental Working Group
Jennifer Hadayia, MPA, Air Alliance Houston
Maria J. Doa, Ph.D., Environmental Defense Fund
Diane Wilson, San Antonio Bay Estuarine Waterkeeper
Charlie Cray, Greenpeace USA
Dianna Cohen, Plastic Pollution Coalition
Russell Armstrong, Hip Hop Caucus
Jackie Nuñez, The Last Plastic Straw
Michael Garfield, Ecology Center
Cynthia Palmer, Moms Clean Air Force
Heather McTeer Toney, Beyond Petrochemicals
Alexis Luckey, Toxic Free NC
Rashmi Joglekar, PhD, University of California, San Francisco

Re: Opposition to Extension of the Comment Period for
Vinyl Chloride, EPA-HQ-OPPT-2018-0448

Dear Members:

Thank you for your letter dated February 26, 2024, in which your organizations request that EPA deny any extension of the open comment period seeking information on vinyl chloride to inform the Agency's consideration of this substance for high-priority designation under the Toxic Substances Control Act (TSCA). To date, the EPA has not received a request to extend the vinyl chloride comment period beyond March 18, 2024.

According to your letter, your group is only aware that an extension has been sought because a polyurethane industry trade association representative mentioned his group's request during the public webinar on February 20, 2024. The agency did, in fact, receive a letter on behalf of the Polyurethane Manufacturer's Association (the "PMA"), dated January 18, 2024, which requested a 60-day extension to the deadline to comment on 4,4'-Methylene bis(2-chloroaniline) (MBOCA) in order to provide an extensive written comment on that chemical. According to the January 18, 2024 letter, the members of

the PMA have extensive experience in safely using MBOCA and the PMA has over 50 years of urinalysis test results, plant and supervisor training programs, and educational guidance documents on the safe use of MBOCA. In that letter, the PMA claimed that without an extension of the March 18 deadline, they may not have enough time to compile and submit all of the information they possess relating to several decades of safe MBOCA use including summary and conclusions of emissions and extraction exposure studies.

Based on the information provided, EPA decided to extend the comment period for MBOCA only (Docket ID No. EPA-HQ-OPPT-2018-0464) by 30 days to April 17, 2024. The March 18 comment deadline for the four other chemicals was not extended in response to PMA's request. This decision was the result of balancing the need to collect as much useful information as possible during this first comment period with the time constraints provided for prioritization in TSCA. Our hope is that this 30-day extension for comments to be submitted on MBOCA provides enough time for the PMA to compile and submit the information and data referenced in their letter with the understanding that if some information is not submitted during this first comment period, the PMA will be able to submit information during the second comment period following publication of the draft priority designation for MBOCA, which EPA expects to publish in July 2024.

The January 18, 2024 letter requesting the extension of the comment deadline for MBOCA, EPA's response letter, and the Federal Register notice announcing the 30-day extension of MBOCA will be placed in the MBOCA docket (EPA-HQ-OPPT-2018-0464). Similarly, your February 26, 2024 letter opposing any comment period extension for vinyl chloride and this response letter will be placed in the vinyl chloride docket (EPA-HQ-OPPT-2018-0448).

If you have further questions or concerns regarding this matter, please feel free to contact Eva Wong, Supervisor of the Prioritization and Informatics Branch 2 (PIB 2), at 202 564-0447.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mary Elissa Reaves".

Mary Elissa Reaves, Ph.D.
Office Director
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency