



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 16, 2024

Stephanie R. Feingold  
Partner  
Morgan, Lewis & Bockius LLP  
502 Carnegie Center  
Princeton, NJ 08540-6241

Dear Stephanie Feingold,

Thank you for your letter on September 13, 2024, to Bethany Masten in the Existing Chemicals Risk Management Division, regarding the U.S. Environmental Protection Agency's proposed regulation of 1-bromopropane (1-BP) under section 6(a) of the Toxic Substances Control Act (TSCA), and requesting a thirty (30) day extension of the public comment period on the proposed rule, from the current September 23 deadline to October 23, 2024.

As you know, TSCA requires prompt regulatory action following risk evaluation to address the unreasonable risks identified in the evaluation. Specifically, section 6(c)(1) provides tight deadlines for issuing proposed rules (within 1 year from publication of the final risk evaluation) and final rules (within 2 years from publication of the final risk evaluation). The 45- day comment period is consistent with typical length of comment periods required by the Administrative Procedures Act, which are between 30 and 60 days, and allows the EPA to still strive to meet the aggressive rulemaking timelines of the law.

In your letter, you state how additional time is necessary for your client to provide meaningful and thoughtful input to the EPA. I want to assure you that the EPA recognizes the importance of having an inclusive and participatory process that fosters transparent, open, and meaningful dialogue with stakeholders as we work to carry out the Agency's mission to protect human health and the environment. The EPA has worked diligently over the past several years to provide stakeholders with multiple notifications regarding the Agency's review of 1-BP and the development of proposed regulatory requirements in an effort to obtain necessary stakeholder input.

The EPA is committed to continued meaningful engagement during the comment period and as the Agency works to finalize the proposed rule. The Agency is open to meeting with any interested organization during the comment period to discuss issues of concern, such as the requested information over degreasing applications of 1-BP, and encourages prompt comment submissions. The

Agency is working to finalize TSCA section 6(a) rules consistent with statutory direction. Statutory timeframes are for the EPA to propose in one year and finalize in two. As a result, the EPA will not be extending the comment period, which closes on September 23, 2024. While not required to respond to information received outside of the comment period, the EPA will consider information as it is able to.

Again, thank you for your letter. We look forward to receiving public comments on the proposed section 6 rule and will give any information your client is able to provide careful consideration along with the other comments the EPA receives. Please contact Joel Wolf, Branch Supervisor ([wolf.joel@epa.gov](mailto:wolf.joel@epa.gov)), or me ([canavan.sheila@epa.gov](mailto:canavan.sheila@epa.gov)) if you have further issues you wish to discuss.

Sincerely,

Sheila Canavan  
Deputy Director, Existing Chemicals Risk Management Division

Cc:

Eileen Murphy, Director/ECRMD  
Bethany Masten  
Joel Wolf