



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

April 24, 2024

**RE:** Meeting with iGPS on EPA's 2023 Proposed Rule for Decabromodiphenyl Ether (decaBDE) and Phenol, Isopropylated Phosphate (3:1); Revision to the Regulation of Persistent, Bioaccumulative, and Toxic Chemicals Under the Toxic Substances Control Act (TSCA).

### *List of Items*

1. Meeting Summary
2. Attendees
3. iGPS-EPA Non-CBI Updated Letter
4. iGPS-EPA Non-CBI Meeting Briefing

### *Meeting Summary*

On April 24, 2024, representatives from EPA met with iGPS, a company that specializes in plastic shipping pallet rentals, to discuss EPA's 2023 proposed regulation for decaBDE. Specifically, the discussion focused on the proposed labeling requirement for plastic pallets that are known to contain decaBDE. iGPS opposes the proposed labeling requirements, which would require iGPS to label plastic shipping pallets that contain decaBDE. iGPS provided an overview presentation, marked as Confidential Business Information (CBI), which discussed their concerns with the costs of labeling plastic pallets that contain decaBDE. iGPS also summarized their comments on the 2023 Proposed decaBDE rule provisions, providing support for the proposed use of personal protective equipment (PPE) and workplace protection measures in areas where pallets containing decaBDE are being recycled. A non-CBI presentation and supporting letter are attached.

### *Attendees*

EPA:

Scott Drewes

Robert Landolfi

Timothy Lehman

Brooke Porter

Wyn Zenni

iGPS:

Jonathan Parks

Lewis Taffer

Arnold & Porter  
Larry Culleen