HSIA FILES COMMENTS ON EPA’S PROBLEM FORMULATION DOCUMENTS

In June, EPA added an additional step to the scoping process for the initial ten chemicals it will evaluate for potential risks under the newly passed Frank R. Lautenberg Chemical Safety for the 21st Century Act, announcing that it would take public comments on problem formulation documents which will refine the original scope prior to the release of the draft risk evaluations. HSIA filed comments on these problem formulation documents on September 19th. Our comments can be viewed at [www.hsia.org](http://www.hsia.org) The problem formulation documents are expected to be released by EPA in six months. All three of HSIA’s mission chemicals – perchloroethylene, trichloroethylene, and methylene chloride – are on the first list of ten. Earlier, HSIA had filed comments on the uses of perchloroethylene, trichloroethylene, methylene chloride and carbon tetrachloride. Overall, the scoping/formulation documents will focus on uses associated with manufacturing, processing, and distribution. EPA will not consider legacy issues such as disposal as part of the assessment, and may exclude, on a case-by-case basis, uses that result in de minimis exposures. The original scoping documents for trichloroethylene and methylene chloride do not include the uses that are the subject of proposed bans, but HSIA expects to continue a dialogue with EPA on this subject.

EPA HOLDS A STAKEHOLDERS’ WORKSHOP ON A USE OF METHYLENE CHLORIDE

EPA, in collaboration with the U.S. Small Business Administration, held a stakeholder workshop in Boston on September 12th in order to gather information on the use of methylene chloride in the furniture refinishing industry. However, most of the workshop focused on consumer uses of methylene chloride based paint removers. While EPA issued a proposed rule under Section 6 of TSCA that would ban consumer use of methylene chloride as a paint stripper, it specifically excluded furniture refinishing, which EPA indicated would be the subject of further review. Attendees at the meeting were asked to provide guidance on safe practices and uses, such as the use of effective personal protective equipment, that may lead to alternatives to removing products from the marketplace. Manufacturers and furniture refinishers agreed that alternative products are less effective, don’t work at all, or are dangerously flammable.

HSIA CONTINUES TO WORK WITH NEW YORK STATE ON DRY CLEANING REGULATIONS

HSIA continues to work with the National Cleaners Association and the New York State Department of Environmental Conservation (DEC) as it modifies Part 232 of the dry cleaning regulations in the State. The new regulations will allow the continued use of perchloroethylene except in residential buildings. The DEC is struggling to develop an approval process for alternative solvents as they present many issues. HSIA will be part of a panel on cleaning solutions for the dry cleaning industry during the New Jersey TexCare expo in October.