



July 28, 2023

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Office of Chemical Safety and Pollution Prevention
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Re: 1,4-Dioxane; Draft Supplement to the TSCA Risk Evaluation; Science Advisory Committee on Chemicals (SACC) Meeting; Notice of Meeting and Request for Comment, 88 *Federal Register* 43562 (July 10, 2023), EPA-HQ-OPPT-2022-0905

Dr. Freedhoff:

The 1,4-Dioxane Panel of the American Chemistry Council requests an extension of the September 8 deadline for comments on the draft supplement to the risk evaluation for 1,4-dioxane. The draft document incorporates several new methods and novel approaches to TSCA risk evaluation that have not been previously subject to public and peer review. These include -

- application of Monte Carlo approaches to estimate occupational and general population exposures and risks,
- development of an aggregate probabilistic model to estimate surface water concentrations,
- estimate of down-the-drain releases, based on SHEDS-IT model predictions of consumer and commercial product usage,
- application of waste disposal models to estimate potential impacts on ground water from landfills and hydraulic fracture waste, and
- evaluation of aggregate exposures and risks for air and surface water.

The use of the various models requires that the Agency make multiple assumptions about concentrations and conditions. In several cases, these assumptions are based on information that is decades old and likely does not reflect current conditions.

Because of the many new and novel approaches, the Agency has incorporated into the draft supplement, EPA has scheduled a 4-day review by the Scientific Advisory Committee on Chemicals (SACC) beginning September 12. Given the breadth of issues to consider, the SACC could greatly benefit from the input of informed stakeholders. With a deadline for written comments just 4 days before the start of the meeting, however, it is unlikely that SACC members will have an opportunity to review the public comments received. Although we expect that the SACC meeting will allow for



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July 28, 2023

Page 2

public comments, the brief time allotted to speakers is inadequate to provide meaningful input on the multiple issues raised by the Agency's analysis.

Since the September 8 comment deadline does not provide an opportunity for SACC review, ACC requests that the deadline be extended for 30 days so that stakeholders can provide input on the draft supplement as well as the SACC's discussions of it.

Sincerely,

Steve Risotto

Stephen P. Risotto
Senior Director

