

TSCA RISK MANAGEMENT RULE

Trichloroethylene

August 27, 2024



⋮

TCE USES

TCE KEY CHALLENGES

Concerns About the Scientific Basis for the Proposed Rule:

- Reliance on certain animal studies suggesting fetal cardiac defects and autoimmunity, which lack broader scientific support.
- These studies have not been replicated by other laboratories.
- EPA's own scientific advisors have recommended against using these studies as a basis for regulatory decisions.
- We urge reconsideration in favor of more robust data to ground the regulation in the best available science.

Issues with the Proposed Exposure Limits:

- Proposed ECEs of 1.1 ppb and 4 ppb are far lower than current occupational exposure limits and below the detection limits of existing analytical methods.
- Compliance would be nearly impossible to demonstrate, making the regulation impractical and unenforceable.
- Alignment with DoD occupational exposure limit.
- EPA should adopt a technology-based approach focusing on proven methods for controlling exposures.

Concerns Regarding the Phaseout Schedule and Exemptions:

- Proposed phaseout of TCE in HFC-134a production does not align with the existing phase-down schedule under the AIM Act.
- This misalignment could disrupt efforts to transition to lower global warming potential substances.
- Reuse of TCE produced as a byproduct should not be subjected to this phaseout.

TCE KEY CHALLENGES

Remediation and Wastewater Treatment Challenges:

- Implementing a Workplace Chemical Protection Program (WCPP) for entities treating TCE-contaminated wastewater presents serious challenges.
- This requirement could significantly slow the pace of environmental remediation at numerous sites.
- The proposed 50-year exemption may not be sufficient for all cleanup projects.

Regulatory and Economic Impacts:

- Concern over the substantial economic impact these regulations could have on industry.
- Costs associated with implementing the WCPP and the potential phaseout of TCE in critical applications could lead to negative economic consequences.
- National security implications must also be considered, as certain uses of TCE are vital to defense and economic stability.