

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH CIRCUIT**

OLIN CORPORATION,

*Petitioner,*

v.

U.S. ENVIRONMENTAL PROTECTION  
AGENCY, ET AL.,

*Respondents.*

Case No. 25-1014 and the  
consolidated cases

**STATUS REPORT**

Respondents the U.S. Environmental Protection Agency and its Administrator, Lee Zeldin (collectively “EPA”), submit this status report in accordance with the Court’s Order of October 20, 2025.

1. EPA promulgated the challenged rulemaking entitled “Carbon Tetrachloride (CTC); Regulation under the Toxic Substances Control Act (TSCA)” 89 Fed. Reg. 103512 (Dec. 18, 2024) (“CTC Rule”) on December 18, 2024. Eight petitions for review of the CTC Rule were filed in seven United States Courts of Appeals and were eventually consolidated in this Court by order of the Judicial Panel on Multidistrict Litigation. *See* ECF No. 5478305.

2. On September 12, 2025, EPA moved for an abeyance in this matter while the Agency reconsiders the CTC Rule through notice and comment

rulemaking. ECF No. 5557418. The Court granted EPA's motion, requiring EPA to submit status reports every 90 days, starting January 20, 2026. ECF No. 5569640.

3. Consistent with EPA's previously filed declaration expressing its intent to solicit early stakeholder input prior to issuing a proposed rule, ECF No. 5557418, EPA published a notice in the Federal Register on October 9, 2025, seeking public comment to inform its reconsideration of the CTC Rule. *See* 90 Fed. Reg. 48203 (Oct. 9, 2025). The public comment period closed on November 10, 2025, and twenty-nine public comments were submitted to the docket.

<https://www.regulations.gov/document/EPA-HQ-OPPT-2020-0592-0182/comment>

4. On March 27, 2026, EPA issued a proposed rule that would extend certain CTC Rule compliance deadlines. *See* 91 Fed. Reg. 14790 (March 27, 2026). The public comment period on this proposed rule closes on April 27, 2026. *See id.*

5. EPA continues to consider information received in response to the 2025 public comment solicitation, and other reasonably available information, to inform the development of a proposed rule to amend the CTC Rule as appropriate, consistent with EPA's previously filed declaration. *See* 91 Fed. Reg. at 14793, 14794 (noting ongoing reconsideration and intent to propose amendments to CTC Rule in a separate action); *EPA Extends Compliance Dates for Perchloroethylene and Carbon Tetrachloride TSCA Rules*, <https://www.epa.gov/chemicals-under->

tsca/epa-extends-compliance-dates-perchloroethylene-and-carbon-tetrachloride-  
tsca (March 24, 2026) (noting that EPA intends to publish a proposed rule “in or  
around summer 2026 to amend various aspects” of the CTC Rule). Accordingly,  
EPA’s administrative reconsideration remains ongoing, and EPA will file another  
status report on or before July 20, 2026.

Respectfully submitted,

DATED: April 20, 2026

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## CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2026, I filed the foregoing Status Report with the Clerk of the Court for the United States Court of Appeals for the Eighth Circuit using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Rachel D. Martinez  
RACHEL D. MARTINEZ