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Congress of Industrial  
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# AFL-CIO

AMERICA'S UNIONS

February 2, 2026

Douglas Troutman  
Assistant Administrator for Toxic Substances  
Environmental Protection Agency  
Office of Chemical Safety and Pollution Prevention  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460-0001

**Re: Formaldehyde; Updated Draft Risk Calculation Memorandum, Docket  
No. EPA-HQ-OPPT-2018-0438**

Dear Assistant Administrator Troutman,

These comments are submitted by the American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), the democratic, voluntary federation of 64 national and international labor unions representing 15 million working people across various industries throughout the United States. In addition to this letter, the AFL-CIO joined the detailed comments submitted by Earthjustice. We write separately to emphasize the consequential implications of EPA's revised draft risk evaluation for formaldehyde to workers as a susceptible subpopulation under the Toxic Substances Control Act (TSCA). The AFL-CIO has played a central role in both the passage and the implementation of the original TSCA and the 2016 Frank R. Lautenberg Chemical Safety for the 21st Century Act, which amended the 1976 TSCA law.

EPA's updated draft risk calculation fundamentally weakens protections for workers by limiting the risk assessment outcome only to acute sensory irritation—ignoring other serious and well-established risks, such as cancer and chronic asthma—and heavily relies on revised inhalation benchmarks that no longer accurately depict work-related exposure scenarios. This risk approach does

not reflect real-world working conditions, leading to acute and chronic formaldehyde exposures, and fails to fulfill TSCA's statutory mandate of preventing unreasonable risk to workers.

Concurrently, we commend EPA for not reducing exposure estimates based on the assumed use of personal protective equipment (PPE) in this particular assessment. In doing so, the EPA's decision appropriately recognizes PPE as the least reliable control in the hierarchy of controls and rejects PPE as a substitute for reducing the baseline exposure estimates developed during risk evaluation. EPA should continue to avoid building assumptions of exposure around PPE altogether.

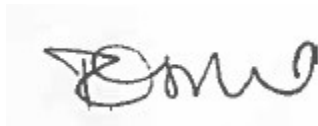
Lastly, we urge EPA to require companies to submit existing formaldehyde monitoring data to EPA. In order to be in compliance with the Occupational Safety and Health Administration (OSHA) formaldehyde standard, employers must already monitor for formaldehyde and maintain appropriate records. Stronger coordination between EPA and OSHA will ensure that risk evaluations under TSCA represent accurate workplace conditions and protect workers on the job.

For these reasons, and further substantiated in grave detail in Earthjustice's comments that the AFL-CIO has signed onto, EPA should discard its proposed revised risk approach reflected in the updated draft risk calculation memorandum.

Respectfully,



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