

BEFORE THE  
ENVIRONMENTAL PROTECTION AGENCY

DOCKET ID NO. EPA-HQ-OLEM-2025-0299

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In Re:

EPA'S PROPOSED RULE: TECHNICAL AMENDMENTS TO THE EPCRA HAZARDOUS  
CHEMICAL INVENTORY REPORTING REQUIREMENTS TO CONFORM TO THE 2024  
OSHA HAZARD COMMUNICATION STANDARD

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COMMENTS OF THE  
NORTH AMERICAN INSULATION  
MANUFACTURERS ASSOCIATION

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NORTH AMERICAN INSULATION MANUFACTURERS ASSOCIATION’S (NAIMA)  
COMMENTS ON THE U.S. ENVIRONMENTAL PROTECTION AGENCY’S  
PROPOSED RULE: TECHNICAL AMENDMENTS TO THE EPCRA HAZARDOUS  
CHEMICAL INVENTORY REPORTING REQUIREMENTS TO CONFORM TO THE 2024  
OSHA HAZARD COMMUNICATION STANDARD  
DOCKET ID NO. EPA-HQ-OLEM-2025-0299  
90 Fed. Reg. 51,226 (November 17, 2025)

## INTRODUCTION

The North American Insulation Manufacturers Association (“NAIMA”) appreciates the opportunity to submit comments in response to the U.S. Environmental Protection Agency’s (“EPA”) Proposed Rule on Technical Amendments to the EPCRA Hazardous Chemical Inventory Reporting Requirements to Conform to the 2024 OSHA Hazard Communication Standard. EPA has proposed to conform the Emergency Planning and Community Right to Know Act’s (“EPCRA”) hazardous chemical inventory reporting regulations to the Occupational Safety and Health Administration’s (“OSHA”) Hazard Communication Standard (“HAZCOM”) amendments of 2012 and 2024. NAIMA supports EPA’s Proposed Rule to conform the EPCRA reporting requirements with the HAZCOM reporting requirements for the reasons set forth herein.

NAIMA is the trade association for manufacturers of fiber glass and rock and slag wool insulation products. NAIMA promotes energy efficiency and pollution reduction through energy savings achieved through the use of thermal insulation products. NAIMA appreciates this opportunity to comment and commends EPA for its proposal to consolidate and harmonize regulatory requirements which reduces the burdens on the regulated community.

## NAIMA SUPPORTS THE PROPOSAL

NAIMA supports EPA’s Proposed Rule because the amendments will make EPCRA reporting sections 311 and 312 consistent with the updated OSHA HAZCOM (2024 version) and the Globally Harmonized System (“GHS”).

The amendment will result in streamlined reporting which will reduce confusion for the reporting facilities by aligning state and local reporting with federal workplace HAZCOM standards. In addition, alignment of the requirements eliminates the necessity of translating chemical data between two different sets of federal hazard categories.

Harmonizing EPCRA with HAZCOM and GHS provides a standardized approach to chemical safety from the factory floor to emergency response. By aligning these regulations with the GHS, the 2025 amendments ensure that all stakeholders use the same terminology and hazard classifications.

Using the same “signal words” and hazard classes as OSHA ensures that firefighters and local emergency planners interpret the hazards of a chemical exactly as a facility’s workers do.

Lastly, the alignment will reduce the time to complete the reporting requirements. These standardized formats across all agencies simplify employee and responder training, as they only need to learn one unified system.

## CONCLUSION

NAIMA urges the EPA to adopt its Proposed Rule as it will establish a harmonized system of requirements, streamline reporting requirements, reduce compliance burdens, and allow direct data transfer.