

CHLORINATED PARAFFINS INDUSTRY ASSOCIATION

1250 Connecticut Avenue, NW • Suite 700 • Washington, DC 20036

Update on CP Industry Interactions with U.S. EPA – April 18, 2017

As we have previously reported, there are a number of chlorinated paraffin (CP) PMNs still under review by EPA, including PMNs for substances in the medium-chain (MCCP), C14-17, long-chain (LCCP), C18-20 and very long-chain (vLCCP), C21+, ranges. These PMNs have been submitted by the three members of CPIA – Dover Chemical, Inovyn, and Qualice LLC.

On April 12, 2017, these three PMN submitters had a joint meeting with EPA to discuss the path forward for these PMNs. EPA indicated at this meeting that it plans to approve the PMNs subject to TSCA Section 5(e) consent orders which will require the generation of additional test data. These consent orders have not yet been sent to the PMN submitters, though EPA indicated that it intends to do this soon. After these consent orders are finalized and signed, EPA will be issuing a significant new use rule (SNUR) that would mirror the requirements of the consent orders. This is a standard practice for EPA in order to apply the testing requirements to any new suppliers entering the market that were not signatories to the consent orders.

Once EPA receives a notice of commencement (NOC) on an approved PMN substance, it will add the substance to the TSCA Inventory. This is expected to occur shortly after the consent orders are signed. Existing users of some CP substances may see new CAS numbers and updated product information from your supplier(s) after these substances have been added to the TSCA Inventory.

CPIA expects to have more details about the consent orders, testing plans, timing, and other aspects of this issue in the coming months and will be issuing additional updates once more information is available.