

**Before the United States
Environmental Protection Agency
Initiation of Prioritization under the Toxic Substances Control Act
Docket EPA-HQ-OPPT-2023-0601**

Comments of the Chemical Users Coalition

The Chemical Users Coalition (“CUC”) appreciates the opportunity to provide these comments regarding the U.S. Environmental Protection Agency’s (“EPA’s” and “the Agency’s”) initiation of the prioritization process for five chemical substances as candidates for designation as “High-Priority Substances” for Risk Evaluation pursuant to Section 6(b) of the Toxic Substances Control Act (“TSCA”). CUC is an association of companies from diverse industries interested in chemical regulatory policy from the perspective of entities that typically acquire and use, rather than manufacture, chemical substances. CUC encourages regulators, such as EPA, to develop a robust body of information concerning chemical substances under consideration for regulatory action, including a thorough understanding of the conditions of use for such substances. When such information is sought, acquired, and considered carefully by regulators, they can more effectively develop and implement potential requirements when necessary to effectively and efficiently protect health and the environment in a manner that enables the regulated community to pursue technological innovation simultaneously with sustainable economic development in the United States.

CUC members have practical knowledge of, and information about, how the five candidate substances are used in the various members’ industries. As EPA proceeds to finalize designation of High-Priority Substances and to likely initiate Risk Evaluations for these substances, CUC urges the Agency to build on the experience of conducting the prior Risk Evaluations, and diligently seek information about, and be cognizant of, the real-life (on-going) uses of the designated substances in the market, including, but not limited to, those sectors represented by CUC members. CUC encourages EPA to start now to gather information so the Agency can thoroughly understand the actual conditions of such uses in the workplace and the considerable importance that products which might contain these substances can have in the commercial, industrial and consumer sectors in which they play a role.

EPA must also gather and analyze information concerning the level of effort required to develop suitable products for specialized uses in highly technical and complex equipment such as those created and used in the CUC members’ sectors, including equipment with government-mandated specifications. This information will enable EPA personnel to better understand the potential consequences that can follow from any decision to restrict use of a specific substance, or category of substances.

To assist EPA with understanding how the candidate substances are used, the CUC is providing the information below. This information is based on initial feedback received from CUC members, but it may not be an exhaustive list of the various products and circumstances in which the identified substances are used or may be present. Some of these products contain the identified substances only in trace amounts. Thus, the CUC hopes that EPA will take the needed time to investigate all ongoing and potential uses of the substances, the workplace controls utilized when they are manufactured, processed and used, and their criticality in essential applications. Accordingly, EPA should more fully investigate whether there are technically feasible alternatives available for the listed substances in the uses identified.

CUC appreciates EPA’s interest in seeking public input regarding its prioritization of chemical substances for potential Risk Evaluations, and CUC would be pleased to meet with EPA personnel to discuss these comments.

1. Acetaldehyde (CASRN 75-07-0),
 - Used as an intermediate or processing aid in the manufacture of components used in aerospace and defense applications. Uses include but are not limited to:
 - Epoxy film adhesive
 - Used in the following electronics product categories.
 - Automobile components
 - Imaging products such as cameras and camcorders
 - Displays
 - Projectors
 - Audio equipment
 - Broadcasting system
 - Used in the following electronics components.
 - Harnesses
 - Cables
 - Sheets
 - Rubbers
 - Films
2. Acrylonitrile (CASRN 107-13-1),
 - Used as an intermediate or processing aid in the manufacture of components used in aerospace and defense applications. Uses include but are not limited to the following.
 - Carbon fiber prepreg
 - Epoxy resin
 - Fuel tank sealant
 - Adhesive film
 - Used in the following electronics product categories.
 - Imaging products such as cameras and camcorders
 - Automobile equipment
 - Audio equipment
 - Broadcasting systems
 - Displays
 - Projector
 - Used in the following components:
 - Optical units
 - Speaker boxes
 - Battery cases
 - Fans
 - Adhesive sheets
 - O-rings
3. Benzenamine (CASRN 62-53-3),
 - Used as an intermediate or processing aid in the manufacture of components used in aerospace and defense applications. Uses include but are not limited to the following.

- Aircraft turbine engine lubricating and corrosion prevention oils
 - Instrument and pneumatic system greases
 - Hydrazine
 - Used in the following electronics product categories.
 - Speaker systems Audio equipment
 - Imaging products such as cameras and camcorders
 - Broadcasting systems
 - Used in the following components:
 - Cable parts
 - Magnets
 - Switch holders
 - Seals
 - Housings
 - Ink
4. 4,4'-Methylene bis(2-chloroaniline) (MBOCA) (CASRN 101-14-4),
- Used as an intermediate or processing aid in the manufacture of components used in aerospace and defense applications. Uses include but are not limited to the following.
 - Potting compound Used in the following electronics product categories.
 - Audio systems
 - Imaging products such as cameras and camcorders
 - Cameras
 - Used in the following components.
 - Switch blocks
 - Covers
5. Vinyl Chloride (CASRN 75-01-4).
- Used as an intermediate or processing aid in the manufacture of components used in aerospace and defense applications.
 - Pin hole filler
 - Used in the following electronics product categories.
 - Speaker systems
 - Imaging products
 - Used in the following components.
 - Cords
 - Housings
 - Wire insulation
 - Used to make polyvinyl chloride products.
 - Pipes
 - Wire and Cable coatings
 - Packaging material