

## SUMMARY

### EPN Comments on EPA Draft Risk Evaluation of 1-Bromopropane for September Science Advisory Meeting

August 30, 2019

On August 30, 2019, EPN submitted [comments](#) to the Science Advisory Committee on Chemicals (SACC) to aid in its review of EPA's draft risk evaluation of the chemical 1-Bromopropane (1-BP) under the Toxic Substances Control Act (TSCA). 1-BP is a solvent used in degreasing, dry cleaning, spray adhesives and aerosol solvents that has been linked to neurological effects and may cause cancer and reproductive disorders. It is the fourth of ten chemicals undergoing EPA risk evaluations under TSCA. EPN objected to the process followed and basis on which EPA conducted the risk evaluation for 1-BP, as it did with the previous risk evaluations for [Pigment Violet 29](#) and [HBCD and 1,4-Dioxane](#). EPN urges EPA to discontinue the use of a flawed TSCA systematic review process to prevent endangering public health and the environment.

EPA scheduled the SACC [meeting](#) to discuss the draft risk evaluation on 1-BP in September, a month before the October 11, 2019, close of the public comment period. EPN submitted its comments in advance of the SACC meeting to ensure that its concerns would be considered during the SACC review. EPN may submit more detailed comments on the risk evaluation for 1-BP before the close of the public comment period, but focused these comments on the critical policy issues that affect 1-BP and all future chemical risk evaluations under TSCA. As EPN noted in its [comments](#) on Cyclic Aliphatic Bromide Cluster (HBCD) and 1,4-Dioxane, it is extremely disingenuous for EPA to schedule a SACC meeting at which risk evaluations will be discussed prior to the deadline for public comments. This is a reversal of past procedures and is an approach that seems to value arbitrary deadlines over solid decision-making; it has the potential to discourage public comment. EPN raised concerns that the SACC would conclude its review and make determinations before the public has full opportunity to weigh in.

EPN comments raised concerns about:

- **Use of a flawed TSCA systematic review process.** The currently used systematic review process—the scientific method for identifying, assessing and integrating data from multiple sources—has never been externally peer-reviewed. EPN recommends that EPA stop using the process until it has been formally peer reviewed and revised to follow accepted scientific principles.
- **The adequacy of the toxicity database used to assess the potential for human health hazards, as it has for all chemicals selected for review.** No determination has been made related specifically to 1-BP.
- **EPA's approach to determining unreasonable risk to workers.** EPA underestimates the risk by assuming workers will use personal protective equipment (PPE), such as respirators, during all of their work throughout their careers, even when such equipment is not required, provided or used. EPN believes that EPA should make its unreasonable risk determination based on workers not using PPE.

### Background

TSCA was passed in 1976 to keep dangerous chemicals off the market and protect people from exposure to existing chemicals. It was [amended and strengthened](#) in 2016, requiring EPA to set priorities for which chemicals to assess, evaluate their risks and impose restrictions to protect people's health and the environment.