

SUMMARY

EPN Comments for EPA'S SACC Meeting on the Draft Risk Evaluation of the Chemical 1-Bromopropane

August 30, 2019

On August 30, 2019, EPN submitted [comments](#) to the Science Advisory Committee on Chemicals (SACC) to aid in its review of the risk evaluation for the chemical 1-Bromopropane (1-BP) under the Toxic Substances Control Act (TSCA) during the in-person SACC [meeting](#) from September 10–12, 2019. 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 ensure the safety of existing chemicals by setting priorities for which chemicals to assess, evaluating their risks and imposing restrictions to eliminate unreasonable risks. EPN's review of the draft risk assessment found serious flaws in the overall review process and weaknesses in the quality and quantity of the data EPA is using to determine unreasonable risk.

1-BP is the fourth chemical of ten chemicals undergoing EPA risk evaluations. 1-BP is a solvent used in degreasing, dry cleaning, spray adhesives, and aerosol solvents that has been linked to neurological illnesses and may cause cancer and reproductive disorders.

EPN may submit more detailed comments on the risk evaluation before the close of the public comment period on October 11, 2019, but is focusing these initial comments on the most critical policy issues that affect not only 1-BP but all future chemical risk evaluations under the TSCA. As EPN noted in its [comments](#) for Cyclic Aliphatic Bromide Cluster (HBCD) and 1,4-Dioxane, it is extremely disingenuous that a SACC meeting, at which the risk evaluation will be discussed, was scheduled prior to the deadline for the comments. This is a reversal of the way EPA normally does things, is an approach that seems to value an arbitrary deadline over solid decision-making, and is potentially a mechanism to discourage public comment. EPN is concerned that the SACC will have concluded its review before the public comment period closes.

EPN produced these comments due to concerns with:

- **Use of the flawed TSCA systematic review process.** The current systematic review process has never been externally peer-reviewed. EPN recommends that EPA stop using the TSCA systematic review process until it has been formally peer reviewed and revised to follow accepted scientific principles.
- **Adequacy of the database to assess potential for human health hazard.** Across all four of the first ten draft TSCA risk evaluations, information quality and quantity is proving not to be a critical component of the agency's decision-making process in determining Benchmark Margins of Exposure used to characterize chemical risks.
- **Concern about the agency's approach for determining unreasonable risk to workers.** EPA underestimates that risk by assuming workers will use personal protective equipment (PPE), such as respirators and gloves, that will protect them against health or safety risks during all of their work activity throughout their careers, even when such equipment is not required, provided or used. We would argue that EPA should make its unreasonable risk determination based upon "no PPE" scenarios.

EPN objects to the process followed and basis on which EPA conducted the risk evaluations for 1-BP, as it did with the previous risk evaluation for [Pigment Violet 29](#). EPA needs to base its decisions on adequate data and expand its considerations of the populations at risk. EPN urges EPA to discontinue the use of the flawed TSCA systematic review to prevent endangering public health and the environment.