

November 22, 2019

The Honorable Frank Pallone, Jr.
Chairman, Committee on Energy and
Commerce
U.S. House of Representatives
2107 Rayburn House Office Building
Washington, DC 20515

The Honorable Greg Walden
Ranking Member, Committee on Energy and
Commerce
U.S. House of Representatives
2185 Rayburn House Office Building
Washington, DC 20515

The Honorable John Barrasso
Chairman, Committee on Environment and
Public Works (EPW)
U.S. Senate
307 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Thomas R. Carper
Ranking Member, Committee on Environment
and Public Works (EPW)
U.S. Senate
513 Hart Senate Office Building
Washington, DC 20510

Re: Imminent and Serious Health Risks from Acute Consumer and Worker Exposure to Methylene Chloride

Dear Chairmen Pallone and Barrasso and Ranking Members Walden and Carper:

Please disregard the letter to the Chairmen and Ranking Members regarding methylene chloride (MC) sent earlier. The letter was incorrectly addressed. Please see the attachment for what was corrected and sent to Administrator Wheeler and others at the U.S. Environmental Protection Agency (EPA). The letter below has been crafted for your viewing, to express our concerns regarding EPA's draft risk evaluation for MC.

The [Environmental Protection Network](#) (EPN) is an organization comprised of over 450 EPA alumni volunteering their time to protect the integrity of the EPA, human health and the environment. We harness the expertise of former EPA career staff and confirmation-level appointees to provide an informed and rigorous defense against current Administration efforts to undermine public health and environmental protections.

We are writing to you to express our concern about the serious health risks demonstrated in EPA's draft risk evaluation for MC under the Toxic Substances Control Act (TSCA). MC is acutely lethal, a neurotoxicant, and a likely human carcinogen. The primary target organ of MC acute toxicity is the brain, with neurological effects resulting either from direct narcosis or the formation of carbon monoxide. Carbon monoxide is toxic because it binds more effectively than oxygen to hemoglobin, the protein that carries oxygen to all of the tissues of the body. The accumulation of carboxyhemoglobin in the blood can lead to sensory impairment, dizziness, incapacitation, coma, heart failure, and death. We understand that over 80 deaths have been linked to MC exposure. The neurotoxic and cardiovascular effects may be exacerbated in fetuses and infants with higher residual levels of fetal hemoglobin when exposed to high concentrations of MC. People with lung and heart disease are also at higher risk of these health effects.

EPA's draft evaluation concluded that current exposure to MC by nearly all workers and consumers exceeds safe levels and represents an unacceptable risk. Since the usual timeline for completion of a risk evaluation and regulatory action under TSCA is several years, consumers and workers will continue to be exposed to MC and at risk of these serious effects for an additional, inordinate period of time if the agency follows a "business as usual" scenario. This will likely lead to additional deaths.

We have written to EPA Administrator Wheeler to request that EPA use its authority under TSCA to take immediate action to protect exposed consumers and workers. Our letter is attached. We urge you to express to EPA your concern about these serious public health concerns and support for immediate action.

We would be pleased to follow up with your staff and provide additional information.

Respectfully submitted,

Michelle Roos
Executive Director
Environmental Protection Network