

April 21, 2020

Andrew Wheeler, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20004

Re: Request for Extension of Comment Period for TSCA Scope Documents

Dear Administrator Wheeler:

The [Environmental Protection Network](https://www.epn.org/) (EPN) is an organization comprised of over 500 U.S. Environmental Protection Agency (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.

On April 16, 2020, we sent you a letter requesting an extension of the 45-day comment period to 90 days (August 10) for the draft scope documents for 13 chemicals under section 6 of the Toxic Substances Control Act, which EPA announced on April 9, 2020 (85 FR 19941). Today we are requesting an extension of the comment period for the draft scope documents for seven additional chemicals EPA announced on April 17, 2020. EPA's procedures for risk evaluation provide for a 45-day comment period for a *single* scope document. In our April 16 letter, we stated that it is unreasonable to expect the public to review and comment on 13 documents in the 45-day period EPA has allowed because any meaningful review in this time frame is impossible. The review period for the additional seven chemicals substantially overlaps the review period for the original 13. We are therefore requesting that the comment period for all scope documents be extended to August 31, 2020.

As we noted before, the scope documents represent a crucial step in the risk evaluation process. The scope process defines the hazards, exposures, conditions of use and the potentially exposed or susceptible subpopulations EPA plans to consider in the risk evaluation. It also includes a conceptual model (which describes the relationships between the chemical under the conditions of use and humans and the environment) and an analysis plan, which identifies the approaches and methods EPA intends to use to assess exposures and hazards. If the scope is wrongly defined, the risk evaluation will be incomplete or contain substantial errors. The time for the public and EPA to ensure that EPA's risk evaluation is taking the right approach is during the scope process. We believe that a well-considered review and substantive comments on the scope documents will lead to better risk evaluations and a more efficient process.

Respectfully submitted,

Michelle Roos, Executive Director  
Environmental Protection Network

cc: Alexandra Dunn