

**EPN Comments on n-Methypyrrolidone;
Draft Revision to Toxic Substances Control Act Risk Determination**

Docket No.: EPA-HQ-OPPT-2016-0743

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Founded in 2017, the [Environmental Protection Network](https://www.epn.org/) (EPN) harnesses the expertise of more than 550 former Environmental Protection Agency (EPA) career staff and confirmation-level appointees from Democratic and Republican administrations to provide the unique perspective of former regulators and scientists with decades of historical knowledge and subject matter expertise.

EPN is pleased to comment on EPA's Draft Revision to Toxic Substances Control Act (TSCA) Risk Determination for n-Methypyrrolidone (NMP).

EPA, in accordance with administrative provisions of TSCA section 6(b)(2)(A), published a risk evaluation for NMP in December 2020, based on 1) making unreasonable risk determinations separately on each individual condition of use evaluated in the risk evaluation and 2) the assumption, for several conditions of use, that personal protective equipment (PPE) would always be provided to and used by those potentially exposed to NMP.

EPA's draft revision to the December 2020 NMP risk evaluation would, when final, make a revised determination of unreasonable risk for NMP as a whole substance. This revised determination is based on 1) EPA's finding that NMP, as a whole chemical substance, presents an unreasonable risk of injury to health when evaluated under its conditions of use and 2) that there should be no assumption that all workers always have access to and appropriately utilize PPE.

As noted in the draft revision to the risk determination, the current draft revisions 1) are based on the whole chemical substance instead of by individual conditions of use and 2) do not rely on assumptions regarding use of personal protective equipment.

In summary, under the draft revision of the NMP risk evaluation pursuant to TSCA section 6(b), EPA proposes the conclusion that NMP, evaluated as a whole chemical, presents an unreasonable risk of injury to health under its conditions of use, and does not rely on assumptions of appropriate use of personal protective equipment.

EPN agrees with the reasoning and conclusions drawn by EPA in this draft revision to the TSCA risk determination of NMP.