

Message

From: Rozsa, Gabe [Gabe.Rozsa@prime-policy.com]
Sent: 6/22/2018 1:45:32 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
CC: Chris Mitchell [ChrisMitchell@ipc.org]
Subject: Electronic Byproducts Sent for Recycling

Dear Dr. Beck,

I am writing on behalf of our client, IPC, the Association Connecting Electronics Industries, concerning an issue we have discussed in the past, regulatory streamlining of the reporting other requirements under TSCA for inorganic byproduct sent for recycling.

As you know, this issue was addressed in the Frank R. Lautenberg Chemical Safety for the 21st Century Act and was the subject of a negotiated rulemaking that failed to achieve consensus. Despite that failure, we believe EPA has direction from Congress to work toward, at a minimum, an easing of the reporting requirements on this industry and perhaps a lessening of the overall regulatory burden of compliance with TSCA for lower risk chemicals. We are also aware that EPA is working on a number of other fronts to look for ways to streamline and prioritize regulations to improve outcomes for all including making sure that scarce industry and regulatory resources are focused on the problems that pose the greatest environmental risk while also minimizing the regulatory burden to that needed to adequately address the risk.

We recently met with Deputy Administrator Wheeler and he urged us to continue the dialogue on measures underway within the EPA to address our concerns. I was hoping to set up a follow on conversation with you and the DC leadership of IPC on this subject in the near future. Please send me dates and times that might work for you and your staff to continue the dialogue.

Gabe

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