

Message

From: Beck, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=168ECB5184AC44DE95A913297F353745-BECK, NANCY]
Sent: 8/8/2017 1:50:30 PM
To: DEKLEVA, LYNN ANN [Lynn-Ann.Dekleva-1@dupont.com]
Subject: Re: Polymer Exemption Technical Contact Request

Hi Lynn,
Dave Schultz should be the correct contact. We will have him reach out to you to set up a meeting. If this is not productive please let me know.
Regards,
Nancy.

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP
P: 202-564-1273
M: Ex. 6
Beck.Nancy@epa.gov

On Aug 7, 2017, at 7:58 AM, DEKLEVA, LYNN ANN <Lynn-Ann.Dekleva-1@dupont.com> wrote:

Nancy,
I am trying to find a contact at the agency to have a technical discussion on the definition of "degradation" for Polymer Exemptions. I tried submitting my question through the normal channels but ended up hitting a dead end. Can you provide a contact?
Thanks for your help.

Regards,
Lynn

Lynn Ann Dekleva, PhD
Product Stewardship & Regulatory Senior Consultant
DuPont
Chestnut Run Plaza 702/2304F
974 Centre Road
Wilmington, DE 19805

Ex. 6 (Cell)

-----Original Message-----

From: DEKLEVA, LYNN ANN
Sent: Wednesday, July 12, 2017 1:28 PM
To: Schutz, David <Schutz.David@epa.gov>
Cc: Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Ross, Adam <ross.adam@epa.gov>; Lee, Doyoung <Lee.Doyoung@epa.gov>; Anapolle, Kent <Anapolle.Kent@epa.gov>
Subject: RE: Form submission from: Reviewing New Chemicals under the Toxic Substances Control Act (TSCA) Reviewing New Chemicals under TSCA Contact Us form

Dave,

I have reviewed the regulation and responses to inquiries regarding degradation. The intent of the biodegradation exclusion for the polymer exemption was for polymers that undergo substantial degradation under normal conditions of use or disposal. In their discussion, the Agency acknowledged that essentially all polymers degrade or decompose to a limited degree over time and gave examples of polymers in landfills and stated that the exclusion was not intended to address such degradation. If the polymer is designed or reasonably anticipated to substantially degrade then they would be excluded from the polymer exemption. Substantial biodegradation in a waste treatment system (readily biodegradability test which simulates a waste water treatment plant) would render a polymer ineligible for the exemption.

The question I have is: to assess the degradability of a polymer for potential polymer exemption, a reasonable assessment would be the Readily biodegradability test? Aerobic composting is not a reasonable assessment of the degradability potential of the materials for the polymer exemption since this method of disposal generally are restricted to yard, food and farm wastes with only a small amount of industrial wastes reported to be composted. The fate of the material in landfills will inform the cradle to grave assessment and potential fate of the material but should not be used to assess the material for polymer exemption.

Regards,
Lynn

Lynn Ann Dekleva, PhD
Product Stewardship & Regulatory Senior Consultant DuPont Chestnut Run Plaza 702/2304F
974 Centre Road
Wilmington, DE 19805

Ex. 6 (Cell)

-----Original Message-----

From: Schutz, David [<mailto:Schutz.David@epa.gov>]
Sent: Wednesday, July 12, 2017 12:02 PM
To: DEKLEVA, LYNN ANN <Lynn-Ann.Dekleva-1@dupont.com>
Cc: Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Ross, Adam <ross.adam@epa.gov>;
Lee, Doyoung <Lee.Doyoung@epa.gov>; Anapolle, Kent <Anapolle.Kent@epa.gov>
Subject: [EXTERNAL] RE: Form submission from: Reviewing New Chemicals under the Toxic Substances Control Act (TSCA) Reviewing New Chemicals under TSCA Contact Us form

Can you let me know a little more about your concerns? We have written some letter responses to inquiries about degradation, and I'd like to see if text from them can be helpful for you. Dave Schutz

-----Original Message-----

From: drupal_admin@epa.gov [mailto:drupal_admin@epa.gov]
Sent: Wednesday, July 12, 2017 11:36 AM
To: Schutz, David <Schutz.David@epa.gov>
Subject: Form submission from: Reviewing New Chemicals under the Toxic Substances Control Act (TSCA) Reviewing New Chemicals under TSCA Contact Us form

Submitted on 07/12/2017 11:35AM

Submitted values are:

Name: Lynn Dekleva

Email: lynn-ann.dekleva-1@dupont.com

Comments:

I would like to have a technical discussion on the definition of degradation for the Polymer Exemption. The guidance document does outline that extensive degradation would make the material ineligible for the polymer exemption.

Can you please provide a contact within the agency with whom I can set up a meeting?

Thanks

Web Area: Reviewing New Chemicals under the Toxic Substances Control Act (TSCA)

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