

Message

From: Beck, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=168ECB5184AC44DE95A913297F353745-BECK, NANCY]
Sent: 10/27/2017 10:39:59 PM
To: STANLEY MILSTEIN [Ex. 6]
CC: Mary Hanley (Hanley.Mary@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=58e0d3d52d424d45ae88e4386ae4f8dd-Hanley, Mary]
Subject: RE: SOT-ACS Colloquium

Stan,
Apologies for the delayed response. Its been a bit busy here.
Regarding your question, you are correct: The definition of “chemical substance” in TSCA Section 3(2) was not changed under the 2016 amendments. For purposes of TSCA, “chemical substance” does not include (among other things) “any drug, cosmetic or device” as defined in FFDCA.

Let me know if you have any additional questions.
Regards,
Nancy

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From: STANLEY MILSTEIN [Ex. 6]
Sent: Tuesday, October 17, 2017 10:04 AM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Cc: STANLEY MILSTEIN [Ex. 6]
Subject: FW: SOT-ACS Colloquium

2nd transmittal (to correct typo in my opening appellation). This is not a USG laptop. Mea culpa..

From: STANLEY MILSTEIN [Ex. 6]
Sent: Tuesday, October 17, 2017 9:59 AM
To: beck.nancy@epa.gov
Cc: STANLEY MILSTEIN [Ex. 6]
Subject: SOT-ACS Colloquium

Dear Dr. Beck (Nancy) ----

Good morning. It was very good meeting you last week at ACS HQ for the joint ACS-SOT meeting. Thanks very much for your outstanding presentation on the new TSCA updates mandated by the Frnak Lautenberg Chemical Safety Act (LCSA).

The question that I had spoken of in our post-talk “sidebar” was whether under “Scope” or “Definitions”, “cosmetic ingredients”, “cosmetics”, or other ingredients and finished products in the range regulated by FDA under the federal FD&C Act are covered by EPA as “chemical substances”; I believe that they weren’t previously covered under TSCA (1976) and that in the new LCSA, this hasn’t changed. I just wanted to confirm this with you, if you know.

Many thanks for your courtesy in taking the time to answer this question. 'Much appreciated.

Stan Milstein

Stanley R. Milstein, Ph.D.

50 Year Member-ACS

Acting Deputy Director, (Retired) – FDA/CFSAN/OCAC

Senior Area IV Director, Society of Cosmetic Chemists (SCC)

Ex. 6

