

January 24, 2025

Rick Keigwin, Acting Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Email: Keigwin.Richard@epa.gov

**Re: ACC 1,3-Butadiene TSCA Risk Evaluation Consortium's Request for Postponement of the February 25-28, 2025, Science Advisory Committee on Chemicals (SACC) and to keep the EPA Dockets EPA-HQ-OPPT-2024-0425 and EPA-HQ-OPPT-2018-0451 open.**

Dear Mr. Keigwin,

The American Chemistry Council (ACC) 1,3-Butadiene TSCA Risk Evaluation Consortium (Consortium) requests that EPA postpone for at least 60 days the upcoming Science Advisory Committee on Chemicals (SACC) meeting, currently scheduled for February 25-28, 2025, regarding the draft 1,3-Butadiene TSCA Risk Evaluation. Furthermore, the Consortium requests that the agency keeps the Dockets (EPA-HQ-OPPT-2024-0425 and EPA-HQ-OPPT-2018-0451) open.

EPA published the draft risk evaluation and thirty-three supporting technical documents on December 3, 2024. The supporting documents contain detailed information, including:

- Extensive Excel worksheets;
- New analyses of hazard endpoints;
- Occupational exposure evaluations; and
- Fenceline and general population exposure analyses.

The SACC preparatory meeting is currently scheduled for February 4, 2025, with a comment deadline of January 31, 2025. The agency, however, has not yet confirmed the *ad hoc* SACC nominees. Considering that the review period overlapped with major religious and secular holidays in December 2024 and early January 2025, and some experts have not yet been appointed, stakeholders, Consortium members, and SACC experts have not had adequate time to thoroughly review the technical documents. This limited opportunity for review is inconsistent with best practices for peer review and stakeholder input.

Moreover, in accordance with the January 20, 2025, Executive Order (EO) "Regulatory Freeze Memorandum,"<sup>1</sup> a postponement of the SACC meeting would allow the new Administration time to review "any questions of fact, law, and policy" the draft risk evaluation may raise.

<sup>1</sup> Available at [www.whitehouse.gov/presidential-actions/2025/01/regulatory-freeze-pending-review/](https://www.whitehouse.gov/presidential-actions/2025/01/regulatory-freeze-pending-review/).



Therefore, we request that EPA reschedule the SACC peer review to allow sufficient time for public stakeholders and SACC reviewers to review and develop comments on the draft risk evaluation. We also request the EPA to keep the EPA Docket EPA-HQ-OPPT-2024-0425 open and/or re-open the EPA-EPA Docket EPA-HQ-OPPT-2018-0451.

On behalf of the Consortium, we appreciate your consideration of these documents in conjunction with those previously submitted to EPA Docket EPA-HQ-OPPT-2018-0451. Should you have any questions or require further clarification, please do not hesitate to contact me directly at the email address provided below.

Thank you for your time and attention to this important matter.

Sincerely,

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Director, Chemical Products & Technology Division  
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CC:

Lynn Dekleva, Deputy Assistant Administrator, Office of Chemical Safety and Pollution Prevention (OCSPP), Nancy Beck, Senior Advisor, OCSPP, Elissa Reaves, Director, Office of Pollution Prevention and Toxics (OPPT), Jeff Morris, Director Existing Chemicals Risk Assessment Division.