

Message

From: Kathleen M. Roberts [kroberts@lawbc.com]
Sent: 1/24/2018 12:15:17 AM
To: Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]
CC: lbergeson@lawbc.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9530e97746d74c8484fd5469fbf432e1-lbergeson@lawbc.com]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Grant, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ec6104b72cab42ba9b1e1da67d4288ae-Grant, Brian]
Subject: TSCA NCC - Letters to EPA on New Chemical Issues
Attachments: 00229053.pdf; 00230086.pdf; 00225160.pdf

Jeff:

Appended are the following communications from the Toxic Substances Control Act (TSCA) New Chemicals Coalition (NCC) for your consideration:

- January 19, 2018, comments from the TSCA NCC in response to the U.S. Environmental Protection Agency's (EPA) request for comment on its process for reviewing new chemical substances under TSCA, as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act (document number 229053). These comments have been submitted to the EPA Docket (EPA-HQ-OPPT-2017-0585).
- January 23, 2018, letter to you to follow up on the TSCA NCC December 1, 2017, letter related to the mandated consultation process with the U.S. Occupational Safety and Health Administration (OSHA) at TSCA Section 5(f)(5) (document number 230086). Assuming your staff is agreeable, we could further discuss the ideas presented in this letter as part of our meeting to discuss the polymer flag approach.
- January 23, 2018, letter to you outlining further the TSCA NCC belief that EPA's current practice of imposing restrictions may be inappropriate and, in many cases, is based on a review process that lacks transparency and on legal and/or scientific principles that are, for the most part, entirely unspecified (document number 225160). The letter identifies areas in which we believe improved consistency is needed to ensure a robust and transparent review process.

The TSCA NCC appreciates your willingness to continue dialogue on this important subject. We look forward to discussing these issues further with your staff.

KATHLEEN M. ROBERTS
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Please note my *new telephone number* above and update this information in your records.