



November 21, 2017

Mr. Albert Kelly
Special Advisor
Office of the Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Office of Land and Emergency Management policy concerning short-term
exposure to trichloroethylene (TCE) in indoor air

Dear Mr. Kelly:

The American Chemistry Council (ACC) represents a number of companies involved in remediation of sites contaminated with trichloroethylene (TCE). These clean-up activities have been complicated by an Agency policy outlined in memos developed by EPA Regions 7, 9, and 10 and the Office of Land and Emergency Management (OLEM) that, despite establishing precedent in the application of Agency estimates of chemical hazard, has not been subject to public notice and comment. As outlined in correspondence to the Agency by ACC and others, moreover, there are numerous concerns with the data underlying EPA's estimate of TCE hazard that create considerable uncertainty that is not reflected in the Agency's policy.

I have enclosed a recent request that ACC sent to OLEM to reconsider its TCE policy and the OLEM response to our request. Although it is difficult to estimate, we are aware of numerous incidences where the TCE policy has resulted in additional time, expense, and public awareness that are not commensurate with the public health concern. I have enclosed a recent report of a Brownfields redevelopment project demonstrating the practical impacts of the Agency's policy on TCE. We estimate that the cost of sampling alone at the Michigan site will cost \$300,000 to \$600,000.

We would like to meet with you to discuss the TCE policy and its impact on remediation under federal, state, and local requirements. I will contact your office to set up a meeting.

Sincerely

Steve

Stephen P. Risotto
Senior Director
Chemical Products and Technology Division

Enclosures

americanchemistry.com®

700 Second St., NE | Washington, DC | 20002 | (202) 249-7000

