



August 9, 2016

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue NW
Washington, DC 20460

Administrator McCarthy:

As you know, important reforms to the Toxic Substances Control Act (TSCA) were signed into law on June 22nd. EPA now has the authority to review the safety of existing chemicals and to restrict them as necessary to ensure that the public and the environment are protected.

The agency's first major decision under the reformed law is the choice of which chemicals to review first. The agency must choose at least ten chemicals from the existing Work Plan list within 180 days of enactment. Once the chemicals are designated, the law's deadlines apply, requiring the evaluations to be completed and any needed restrictions imposed within five years.

The failures of TSCA created a substantial backlog of chemicals with known health and environmental hazards that have not been fully evaluated or controlled. The minimum schedule required under the reforms is very modest relative to this backlog. We are sure you agree, therefore, that EPA must choose the first ten chemicals wisely. The goal should be to achieve the earliest maximum benefit to public health and the environment.

Our organizations evaluated the Work Plan list against several criteria with this goal in mind, including the relative urgency of the threat the chemical poses to public health or the environment and the availability of hazard and exposure information about the chemical. We also believe the agency should focus where its particular resources are needed to make a difference. With so few regulatory resources available across all levels of government, it does not make sense, in our view, for EPA to "double up" on chemicals where states or other federal agencies are taking or considering action.

We therefore recommend the agency name the following chemicals as its first ten: Asbestos, Lead & Lead compounds, Cadmium & Cadmium compounds, 1-Bromopropane, 1,4-Dioxane, Styrene, Cyclic Aliphatic Bromides Cluster of flame retardants (HBCD), Octamethylcyclotetrasiloxane (D4), Nonylphenol and Nonylphenol Ethoxylates (NP/NPEs), and Tetrachloroethylene (PERC).

We hope you will give this list your consideration and we look forward to working with the Agency as it puts the recent reforms into action.

Sincerely,

Alaska Community Action on Toxics
Alliance for a Healthy Tomorrow
Alliance of Nurses for Healthy Environments
Asbestos Disease Awareness Organization
BlueGreen Alliance
Breast Cancer Action
Breast Cancer Fund
Center for Environmental Health
Clean Water Action Connecticut
Clean Water Action Florida
Clean Water Action Massachusetts
Clean Water Action Rhode Island
Coalition for a Safe and Healthy Connecticut
Communications Workers of America
Connecticut Citizens' Action Group
Connecticut Coalition for Environmental Justice
Connecticut Nurses Association
ConnFACT
Conservation Voters for Idaho
Earthjustice
ECHO, Ecological Health Organization
Ecology Center
Environmental Health Strategy Center
Friends of the Everglades
GMO Free CT
Greenpeace USA
Hands Across the River Coalition, Inc.
Healthcare Without Harm
HealthLink
Healthy Legacy Coalition
Healthy Mothers, Healthy Babies Coalition of Massachusetts
League of Conservation Voters
Learning Disabilities Association of America
Maine Conservation Voters
Maryland Public Interest Research Group
Massachusetts Association for the Chemically Injured, Inc.
Massachusetts Breast Cancer Coalition
Massachusetts Nurses Association
Massachusetts Teachers Association - UMass Lowell
Medfield Green

Michigan League of Conservation Voters
Mitchell Environmental Health Associates
Montana Conservation Voters Education Fund
Natural Resources Defense Council
New York League of Conservation Voters
North Carolina Conservation Network
Ohio Environmental Council
Oregon Environmental Council
Physicians for Social Responsibility
Physicians for Social Responsibility-Florida
Stupid Cancer
Toxic Free NC
Toxics Action Center
U.S. Public Interest Research Group
United Steelworkers
Vermont Conservation Voters
Vermont Public Interest Research Group
Virginia League of Conservation Voters
Washington Toxics Coalition
Watchdogs for an Environmentally Safe Town
WE ACT for Environmental Justice
Wisconsin League of Conservation Voters