



Craig Menear, Chairman, CEO and President
The Home Depot
2455 Paces Ferry Rd SE
Atlanta, GA 30339-1834

February 14, 2017

Re: U.S. EPA says that Paint Strippers You Sell Pose a Risk to Human Health

Dear Mr. Menear:

We are writing to alert you that the U.S. Environmental Protection Agency (EPA) has proposed to make a determination that two chemical ingredients in products used for removal of paints and coatings (i.e. "paint strippers") pose an unreasonable risk to human health. These chemicals, methylene chloride (also known as dichloromethane or DCM) and N-methyl pyrrolidone (NMP), pose "risks of concern" to the health of consumers and workers for cancer, developmental harm, and neurotoxicity, according to EPA risk assessments.

That's why on January 19, 2017, the EPA proposed to make a formal finding of "unreasonable risk" and to require by rule the phase out of most uses of these two chemicals for paint stripping, pursuant to the federal Toxic Substances Control Act (TSCA). See <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/federal-register-notice-methylene-chloride-and-n>.

Given the serious health risks associated with such products, rather than waiting for federal regulations to take effect, we respectfully urge you to take the following actions:

1. Determine which paint and coating removal products you sell contain DCM or NMP;
2. Immediately cease further purchase of such products from your suppliers;
3. Phase out sale of paint strippers that contain DCM or NMP as soon as practicable;
4. Advise customers of the health risks associated with exposure to these chemicals;

We appreciate your past leadership in proactively addressing chemicals hazards, such as your phase-out of ortho-phthalates in vinyl flooring. Similarly, we believe safer alternatives to the identified chemical paint strippers are already commercially available.

In addition to protecting the health of your customers, especially women of reproductive age, actions you take to remove these toxic chemicals will help meet the rising consumer demand for safer and healthier products.

The attached fact sheets we prepared summarize the hazards and risks for each of these chemicals, based on the extensive analysis contained in the cited EPA risk assessments. Also attached are a few examples of brand name products sold by your company that contain one of these chemicals.

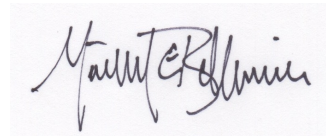
We request the opportunity to meet with your team at your earliest convenience to discuss a strategy for safely substituting these two chemicals in all paint stripper products. To schedule a meeting with us, please contact Mike Schade, Mind the Store Campaign Director at (646) 783-3477 or mikeschade@saferchemicals.org.

Thank you for your commitment to product safety and consumer health protection.

Respectfully,



Mike Schade, Mind the Store Campaign Director
Safer Chemicals, Healthy Families



Mike Belliveau, Senior Advisor
Safer Chemicals, Healthy Families

Enclosures:

Fact sheets on Methylene Chloride and N-Methylpyrrolidone
Examples of products containing these paint stripping chemicals

cc: Ron Jarvis, VP, Environmental Innovation
Krissa Glasgow, Senior Manager of Environmental Innovation

Chemical Name:	Methylene Chloride (also known as Dichloromethane or DCM)		
CAS Registry Number:	75-09-2		
Summary:	DCM is a widely used liquid, volatile organic compound (VOC) that readily evaporates, presenting an inhalation hazard and risk of cancer and toxic effects on the brain and liver.		
National Production:	262 million pounds (in 2011, equals domestic manufacturing + imports)		
Use Presenting a Risk of Concern to EPA:	Paint and coating removal (i.e. paint stripping) (See below for other uses that have not yet been risk assessed yet)		
POTENTIAL IMPACTS ON HUMAN HEALTH			
Exposure:	Health Hazard:	At-Risk Groups Potentially Affected:	Impact:
Short-Term (Acute)	Neurotoxicity (Harm to brain and central nervous system)	Consumers and Workers that use paint & coating removal products Bystanders at workplaces and homes where these products are used	Unknown number at risk
Long-Term (Chronic)	Liver toxicity Liver cancer Lung cancer	Workers & occupational Bystanders : Professional contractors, furniture refinishing, graffiti removal, automotive refinishing, aircraft paint stripping, immersion stripping of wood and metal, art restoration and conservation, other	Nationwide, more than 230,000 workers are directly exposed to DCM from paint stripping
Alternatives:	<ul style="list-style-type: none"> • Non-chemical paint & coating removal methods • Alternative chemical paint strippers 		
Other Uses: not yet assessed	Adhesives, pharmaceuticals, metal cleaning, chemical processing, aerosol spray propellant, polyurethane foam		
Manufacturers (Site Location): (U.S., in 2011)	Dow Chemical (Freeport, TX and Pittsburg, CA); Occidental Chemical (Geismar, LA and Wichita, KS); Solvchem (Pearland, TX); and 1 more manufacturer who claimed its identity and site location to be confidential.		
Source:	U.S. Environmental Protection Agency, TSCA Work Plan Chemical Risk Assessment, Methylene Chloride: Paint Stripping Use, CASRN: 75-09-2, EPA Doc # 740-R1-4003, https://www.epa.gov/sites/production/files/2015-09/documents/dcm_opptworkplanra_final.pdf , August 2014.		

Chemical Name:	N-Methylpyrrolidone (NMP)		
CAS Registry Number:	872-50-4		
Summary:	NMP is a widely used solvent in industry and consumer products to which may be exposed women of reproductive age, who are particularly vulnerable because of developmental toxicity.		
National Production:	185 million pounds (in 2011, equals domestic manufacturing + imports)		
Use Presenting a Risk of Concern to EPA:	Paint and coating removal (i.e. paint stripping) (See below for other uses that have not yet been risk assessed yet)		
POTENTIAL IMPACTS ON HUMAN HEALTH			
Exposure:	Health Hazard:	At-Risk Groups Potentially Affected:	Impact:
Short-Term (Acute)	Miscarriage, fetal death, decreased birth weight, other fetal effects (developmental toxicity) Other toxicity (less sensitive endpoints)	Pregnant women Women of reproductive age (who use NMP-containing products) Workers: Professional contractors; bathtub, automotive, and furniture refinishing; graffiti removal; aircraft and ship paint stripping; art restoration & conservation	Unknown number of consumers are exposed Less than 230,000 workers are exposed
Long-Term (Chronic)			
Alternatives:	<ul style="list-style-type: none"> • Non-chemical paint & coating removal methods • Alternative chemical paint strippers 		
Other Uses: not yet assessed	Petrochemical processing, engineering plastics, coatings (i.e. resins, paints, finishes, inks and enamels), agricultural chemicals, electronics cleaning, and industrial/domestic cleaning		
Manufacturers (Site Location): (U.S., in 2011)	BASF (Geismar, LA); Ashland/ISP Technologies (Texas City, TX); Lyondell Chemical (Channelview, TX); Toray Composites (Tacoma, WA); Nova Molecular Technologies (Pasadena, TX); OMG Electronic Chemicals (Maple Plain, MN); and 2 manufacturers who claimed their identity and site locations to be confidential.		
Source:	U.S. Environmental Protection Agency, TSCA Work Plan Chemical Risk Assessment, N-Methylpyrrolidone: Paint Stripper Use, CASRN: 872-50-4, EPA Doc # 740-R1-5002, March 2015, https://www.epa.gov/sites/production/files/2015-11/documents/nmp_ra_3_23_15_final.pdf .		