

Advocacy Comments on EPA's TSCA Workplan Chemical Risk Assessments of Methylene Chloride, N-Methylpyrrolidone and Trichloroethylene

On March 15, 2013, the Office of Advocacy (Advocacy) submitted a comment letter to the U.S. Environmental Protection Agency (EPA) discussing Advocacy's concerns with EPA's Draft Toxic Substances Control Act (TSCA) Workplan Chemical Risk Assessments (Risk Assessment) of Methylene Chloride (DCM), N-Methylpyrrolidone (NMP) and Trichloroethylene (TCE). The Risk Assessments are part of EPA's efforts to enhance the Agency's Existing Chemicals Management program and will help to focus and direct the program's activities over the next several years.

Advocacy's comment letter includes the following points:

- Small businesses expressed concern with the Risk Assessments' focus on "small commercial shops" because the Risk Assessments contain little actual data on exposure at small commercial shops on which to base a robust analysis. If EPA is going to rely on facility size distinctions in its Risk Assessments, then EPA should either gather more specific data related to facility size or break down the data set by size of facility before finalizing the Risk Assessments.
- Small businesses are also concerned with EPA's assumption that exposures in small commercial shop settings are generally less well-controlled than exposures at large facilities. EPA relied on the assumption that workers in small commercial shops did not wear protective gloves when working with paint strippers. In its outreach with small remodelers, painters and decorators, Advocacy found this assumption to be incorrect.

A complete copy of Advocacy's letter to EPA is available at: www.sba.gov/advocacy.

For further information regarding this issue, visit Advocacy's website at: www.sba.gov/advocacy or contact [Sarah Bresolin Silver](#) at 202-205-6790.