



N-METHYLPYRROLIDONE PRODUCERS GROUP, INC.

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Status of EPA TSCA Section 6 Activities for NMP

The U.S. Environmental Protection Agency's (EPA) risk evaluation activities on N-Methylpyrrolidone (NMP) under Section 6 of the Toxic Substances Control Act (TSCA) have been difficult to follow and thus have been confusing for some stakeholders. Below is an overview of past EPA actions, conclusions, and proposals, followed by a summary of the current regulatory status.

Initial EPA Review of NMP in Paint Remover Products

NMP was included on the 2012 TSCA Work Plan chemicals for assessment list. EPA issued a draft assessment for NMP use in paint remover products in January 2013. EPA included NMP and methylene chloride in the same risk assessment report because both were used in paint remover products and would be addressed by the same peer review. The NMP draft risk assessment focused on inhalation and dermal exposure to consumers and workers.

In March 2015, EPA published a final risk assessment for NMP that identifies risk for frequent users, particularly pregnant women and women of childbearing age, who may have high exposure to paint remover products containing NMP. The scope of the March 2015 assessment included occupational paint stripping applications (acute and chronic exposures, including workers that may be nearby) and consumer paint stripping applications (acute, including other residents that may be nearby). The March 2015 final assessment report did not identify risk associated with any consumer use scenario evaluated.

In November 2015, EPA released a supplemental risk assessment report for NMP, which included assessments of additional consumer-use scenarios that were no part of the March 2015 assessment. The supplemental assessment identified potential consumer risk associated with paint remover products containing NMP.

In January 2017, EPA proposed risk management actions associated with the risk identified in the NMP paint remover product assessment. The EPA proposal included two options:

1. Under Option 1, EPA proposes to prohibit the manufacture (including import), processing, and distribution in commerce of NMP for all consumer and commercial paint and coating removal; to prohibit the use of NMP for all commercial paint and coating removal; to require, consistent with methylene chloride restrictions, downstream notification of these prohibitions throughout the supply chain; to require recordkeeping;

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and to provide a time-limited exemption from these proposed regulations on NMP for coating removal uses critical for national security.

2. Under Option 2, EPA proposes that: (1) commercial users of NMP for paint and coating removal establish a worker protection program for dermal and respiratory protection and not use paint and coating removal products that contain greater than 35 percent NMP by weight (except for product formulations destined to be used by the U.S. Department of Defense (DOD) or its contractors performing work only for DOD projects); and (2) processors of products containing NMP for paint and coating removal reformulate products such that these products do not exceed a maximum of 35 percent NMP by weight, identify gloves that provide effective protection for the formulation, and provide warning and instruction labels on the products.

Expanded Risk Assessment by EPA under Amended TSCA

In December 2016, EPA announced the initial list of ten chemical substances that will be the subject of EPA's initial risk evaluations under TSCA. NMP is included on that initial list of ten. As amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act, which President Obama signed on June 22, 2016, TSCA Section 6(b)(2)(A) requires EPA to "ensure that risk evaluations are being conducted on 10 chemical substances drawn from the 2014 update of the TSCA Work Plan for Chemical Assessments." Although EPA already conducted an initial assessment on paint remover products containing NMP, it decided to include these two chemicals as part of the initial list of ten chemical substances subject to risk evaluation under amended TSCA.

Current Status

The expanded EPA risk assessment for NMP, that will include consideration of all conditions of use for NMP, remains ongoing. While the official deadline to submit information on the problem formulation document has passed, [stakeholders can and should confer with EPA if they have relevant information on specific applications.](#)

EPA staff has indicated that the risk management rule for paint removers containing NMP will be folded into the broader amended risk evaluation/risk management review of NMP.



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Amended TSCA requires EPA to issue a final risk evaluation no later than three years after initiation, with an option for a six-month extension. Based on these timeframes, a final NMP risk assessment on all conditions of use is expected by **December 2019**, unless EPA requests the optional extension.