NMP

N-METHYLPYRROLIDONE PRODUCERS GROUP, INC.

2200 PENNSYLVANIA AVENUE, N.W., SUITE 100W, WASHINGTON, D.C. 20037 • (202) 557-3800 • FAX (202) 557-3836

MANAGED BY B&C® CONSORTIA MANAGEMENT, L.L.C.

NMP News Brief
July 2017

EPA Issues Scoping Document for NMP Risk Evaluation

On June 22, 2017, the U.S. Environmental Protection Agency (EPA) posted the document, "Scope of the Risk Evaluation for N-Methylpyrrolidone (2-Pyrrolidinone, 1-Methyl-)," (NMP scoping document) online. As the name implies, the NMP scoping document outlines the scope of the risk evaluation that EPA intends to conduct on NMP. The scoping document is required under the Toxic Substances Control Act (TSCA) Section 6(b)(4)(D), which mandates that EPA publish the scope of the risk evaluation to be conducted, including the hazards, exposures, conditions of use and potentially exposed or susceptible subpopulations that EPA expects to consider.

EPA states that if a hazard, exposure, condition of use or potentially exposed or susceptible subpopulation is not identified within the scoping document, EPA is not intending to include it in the scope of the risk evaluation at this time.

Stakeholders are reminded that EPA is pursuing risk evaluation/risk management activities on the use of NMP in paint remover products under separate rulemaking actions.

For future chemical risk evaluations, EPA intends to provide for public review and comment on the scoping documents. In the case of NMP and the other nine chemicals identified as the first ten chemicals for risk evaluation under TSCA, however, EPA states that there is insufficient time for a formal comment period on the scoping documents. Instead, EPA has reopened the NMP conditions of use docket for stakeholders to provide additional information if they wish. The docket will remain open until **September 19, 2017**.

Recommendations for NMP Stakeholders in Response to Scoping Document

The NMP Producers Group recommends that NMP stakeholders focus their attention on the information elements that EPA identified for analyzing potential worker and occupational non-user exposures:

1. Review reasonably available exposure monitoring data for specific condition(s) of use. Exposure data to be reviewed may include workplace monitoring data collected by government agencies such as OSHA and the National Institute of Occupational Safety and Health (NIOSH), and monitoring data found in published literature (*e.g.*, personal exposure monitoring data (direct measurements) and area monitoring data (indirect measurements)).

2. Review reasonably available exposure data for surrogate chemicals that have uses, volatility, and chemical and physical properties similar to NMP.

3. For conditions of use where data are limited or not available, review existing exposure models that may be applicable in estimating exposure levels.

4. Review reasonably available data that may be used in developing, adapting, or applying exposure models to the particular risk evaluation.

5. Consider and incorporate applicable engineering controls and/or personal protective equipment into exposure scenarios.

6. Evaluate the weight of the evidence of occupational exposure data.

7. Map or group each condition of use to occupational exposure assessment scenario(s).

If available, industries may wish to submit exposure monitoring data specific to their specific use of NMP to EPA. Likewise, industries should provide specific information on the engineering controls and/or personal protective equipment used within their sectors.

As noted above, the EPA docket will remain open until **September 19, 2017**, so parties can provide additional information to EPA. If a company would prefer to engage with an EPA staff member on submission of information, it should contact Ana Corado at EPA (202-564-0140, corado.ana@epa.gov).

Anticipated Steps and Timeframe for NMP Risk Evaluation and Next Steps

In **December 2017**, EPA is expected to issue a problem formulation document for NMP. EPA has stated that there will be an opportunity for public review and comment on the NMP problem formulation document.

If EPA uses the same approach that it did for previous TSCA Work Plan Chemicals, the problem formulation stage will determine the major factors to be considered in the assessment, including exposure pathways, receptors, and health endpoints. The NMP Producers Group believes that EPA will identify developmental toxicity as the health endpoint of concern for NMP.

The amended TSCA legislation requires that EPA complete a risk evaluation for a chemical substance as soon as practicable, but no later than three years after the date in which EPA initiated the risk evaluation. The legislation also allows for an extension of no more than six months.

As a reminder, the initiation of the NMP risk evaluation began on December 19, 2016, when EPA announced it was one of the ten chemicals to be reviewed under amended TSCA. Based on the timelines in the legislation, EPA should complete its risk evaluation no later than **December 19, 2019**, unless EPA opts for an extension, which, as noted, can be no more than six months.

If the NMP risk evaluation concludes that a condition of NMP use presents an unreasonable risk as defined under TSCA, EPA must propose a risk management rule under TSCA Section 6(a) within one year of the completed risk evaluation; and a final risk management rule one year later (within two years of the completed risk evaluation). There are provisions in the legislation for extensions of no more than two years.

Status of Risk Management Rulemaking for NMP Used in Paint Remover Products

The comment period on the proposed risk management rulemaking for NMP in paint remover products closed on May 19, 2017. As of July 6, 2017, there is no projected date for the final risk management rulemaking noted on the Regulatory Tracker Website.