

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.

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Status of EPA TSCA Section 6 Risk Evaluation for NMP

It appears that the U.S. Environmental Protection Agency (EPA) will need to use the six-month extension option for its risk evaluation on N-Methylpyrrolidone (NMP) under Section 6 of the Toxic Substances Control Act (TSCA).

Under amended TSCA, EPA is supposed to issue a final risk evaluation on a subject chemical no later than three years after initiation, with an option for a six-month extension. As one of the first ten chemicals to be evaluated under amended TSCA, the NMP risk evaluation started in December 2016, which means that a final risk evaluation should be issued in **December 2019**. However, to date, the EPA has not issued the draft risk evaluation for public review and comment, nor has it scheduled the draft report peer review. Given the time needed to complete these tasks, it would be impossible for EPA to complete the final risk evaluation by the **December 2019** deadline.

Recent statements by EPA indicate that the draft risk evaluation will be issued by **January 2020**. At that time, EPA will provide a comment period for the public as well as engage with its peer review panel for review. EPA states that it will complete the final risk evaluation by **June 2020**, which meets its obligations under TSCA of three years plus six months for the final risk evaluation.

NMP is not the only chemical risk evaluation that has been delayed. EPA has indicated that draft risk evaluations for five other chemicals are also behind schedule, but that those chemicals' draft risk evaluations will also be issued by **January 2020**. EPA has not provided a detailed explanation as to what may have affected the schedule, but most stakeholders recognized that the risk evaluation process under amended TSCA would be complicated and that the first set of chemicals, including NMP, would present challenges for EPA staff.

For an overview of the past history of EPA's review of NMP under TSCA, please see the November 2018 <u>NMP News Brief</u>.