



**NMP News Brief**  
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**Findings in Draft EPA TSCA Section 6 Risk Evaluation for NMP, Schedule for EPA Actions and Expectations Related to Risk Management**

In the [Draft Risk Evaluation for N-Methylpyrrolidone \(NMP\) document](#), the U.S. Environmental Protection Agency (EPA) concludes that there are no unreasonable risks to the environment, bystanders, or occupational non-users from NMP for all the conditions of use included in the draft risk evaluation, but the document includes a number of use applications that EPA preliminarily concluded as having unreasonable risk. EPA clearly states that the initial determinations on unreasonable risk are based on its evaluation of available information and are not EPA's final determinations. It will consider all of the information submitted during the comment period, which ended on January 21, 2020, and determine if its initial determinations should be made final. If the EPA conclusions are later made final, it does not mean that those uses will automatically be prohibited or banned. There are many options available to EPA to mitigate unreasonable risk, and EPA is directed to manage such risk to the extent necessary.

**Next Steps in TSCA Risk Evaluation and Risk Management Process**

1. Final Risk Evaluation -- no later than **June 2020**

EPA designated NMP as one of the first ten chemicals to be reviewed under TSCA on December 19, 2016. The mandated three-year risk evaluation schedule, with the provisional six-month extension, means that the final risk evaluation must be issued no later than **June 19, 2020**. At this time, EPA will make a final decision as to which use applications are considered as unreasonable risk.

2. Proposed Risk Management -- **June 2021**

If EPA issues a final decision that one or more NMP applications present an unreasonable risk, it must issue proposed risk management actions for those conditions of use for which unreasonable risk was concluded within one year of the risk evaluation. For NMP, this date would be no later than **June 19, 2021**.

Based on EPA conclusions presented in the draft risk evaluation, it is unreasonable to expect that EPA will attempt to ban those uses of NMP that EPA found to present unreasonable risk. Under TSCA Section 6, EPA has many options available to mitigate unreasonable risk and is required to do so to the extent necessary. EPA's preliminary determinations of unreasonable risk for certain NMP applications are based on high-end

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exposure scenarios that assume a lack of proper personal protective equipment (PPE) use and in particular glove use. It is therefore reasonable to conclude that any future risk management measure that might arise from unreasonable risk determinations will focus on ensuring proper PPE use or otherwise preventing human exposure.

3. Final Risk Management -- **June 2022**

EPA is required to issue the final risk management rule no later than two years after the date of the final risk evaluation. Again, based on the anticipated final risk evaluation date of **June 19, 2020**, and assuming that final determination concludes one or more applications as having unreasonable risk, the final risk management rule would be issued by **June 19, 2022**.

Although the statute does allow for extension of the proposed and final risk management rules for up to two years, this option does not apply to NMP, as it is a chemical drawn from the 2014 TSCA Work Plan for Chemical Assessments, and this option does not apply to those listed chemicals.

### **Potential Stakeholder Impacts**

Most industry stakeholder groups are already using the appropriate engineering controls and PPE measures to protect workers. Thus, even if EPA proceeds with issuing a final regulation requiring certain gloves and/or other PPE, it will have no material impact on those operations that have already implemented these controls.

There will be regulatory ramifications from a Section 6 risk management action, such as specified documentation requirements, hazard communications, and lower reporting thresholds for Chemical Data Reporting. Overall daily operations related to worker protection for most user groups, however, are not expected to be significantly impacted.

The NMP Producers Group strongly encourages all NMP stakeholders to remain engaged, with particular focus on the risk management measures proposed by EPA for their applications of interest.