

**CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA**

1615 H STREET, NW
WASHINGTON, DC 20062
(202) 463-5310

August 16, 2018

VIA ELECTRONIC FILING

Ms. Christina Motilall and Ms. Iris Camacho
Risk Assessment Division, Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

RE: Problem Formulations for the Risk Evaluations To Be Conducted Under the Toxic Substances Control Act, and General Guiding Principles To Apply Systematic Review in TSCA Risk Evaluations; Notice of Availability, 83 Fed. Reg. 26,998 (June 11, 2018); Docket No. EPA-HQ-OPPT-2018-0210; FRL-9978-40

Dear Ms. Motilall and Ms. Camacho:

The U.S. Chamber of Commerce submits these comments in response to the U.S. Environmental Protection Agency's ("EPA") problem formulation documents for the first ten chemicals undergoing risk evaluations, as well as its systematic review approach for chemical risk evaluations under the Toxic Substances Control Act ("TSCA").¹

Many of the Chamber's members are subject to regulation under TSCA and the Chamber has long supported a high quality, science-based chemical management and evaluation process. The Chamber applauds EPA's transparency and commitment to logically addressing the circumstances surrounding the manufacturing, processing, distribution, use, and disposal of regulated chemicals.

The Chamber seeks to advance the positions of the chemical industry and downstream chemical users on these issues, and supports the comments submitted by the American Chemistry Council as well as manufacturing associations such as the American Forest & Paper Association, the Motor & Equipment Manufacturers Associations, the Toy Industry Association, the U.S. Tire Manufacturers Association, and others. These organizations have provided comments that include recommendations for EPA's approach to problem formulation.

¹ Problem Formulations for the Risk Evaluations To Be Conducted Under the Toxic Substances Control Act, and General Guiding Principles To Apply Systematic Review in TSCA Risk Evaluations; Notice of Availability, 83 Fed. Reg. 26,998 (June 11, 2018).

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The Associations' comments specifically include recommendations regarding: conditions of use; application of tiered approaches; occupational, ecological, and consumer exposure assessments; and hazard and ecological hazard assessments.

The Chamber encourages EPA to carefully consider their comments when finalizing these problem formulation documents and general guiding principles, and appreciates EPA's consideration of these comments. If you have questions regarding these comments, please contact me at (202) 463-5558 or at kharbert@uschamber.com.

Sincerely,

A handwritten signature in black ink, appearing to read "K A Harbert". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Karen A. Harbert