



Chlorine
Panel

Carbon Tetrachloride (CTC) - TSCA Section 6 Risk Management Rule

July 11, 2024



Conditions of Use – Carbon Tetrachloride

- Feedstock for the manufacture of low Global Warming Potential (GWP) refrigerants and foam blowing agents
- These products are critical to meeting the objectives of the –
 - American Innovation and Manufacturing (AIM) Act
 - Kigali Amendment to phase down high GWP substances.

CTC FEEDSTOCK USE

CTC is the feedstock for all the low GWP HFO alternatives that will enable compliance with the Kigali Amendment and the AIM Act, including the refrigerant HFO-1234yf.

95%

Today 95% of all cars sold in the US use HFOs



2025

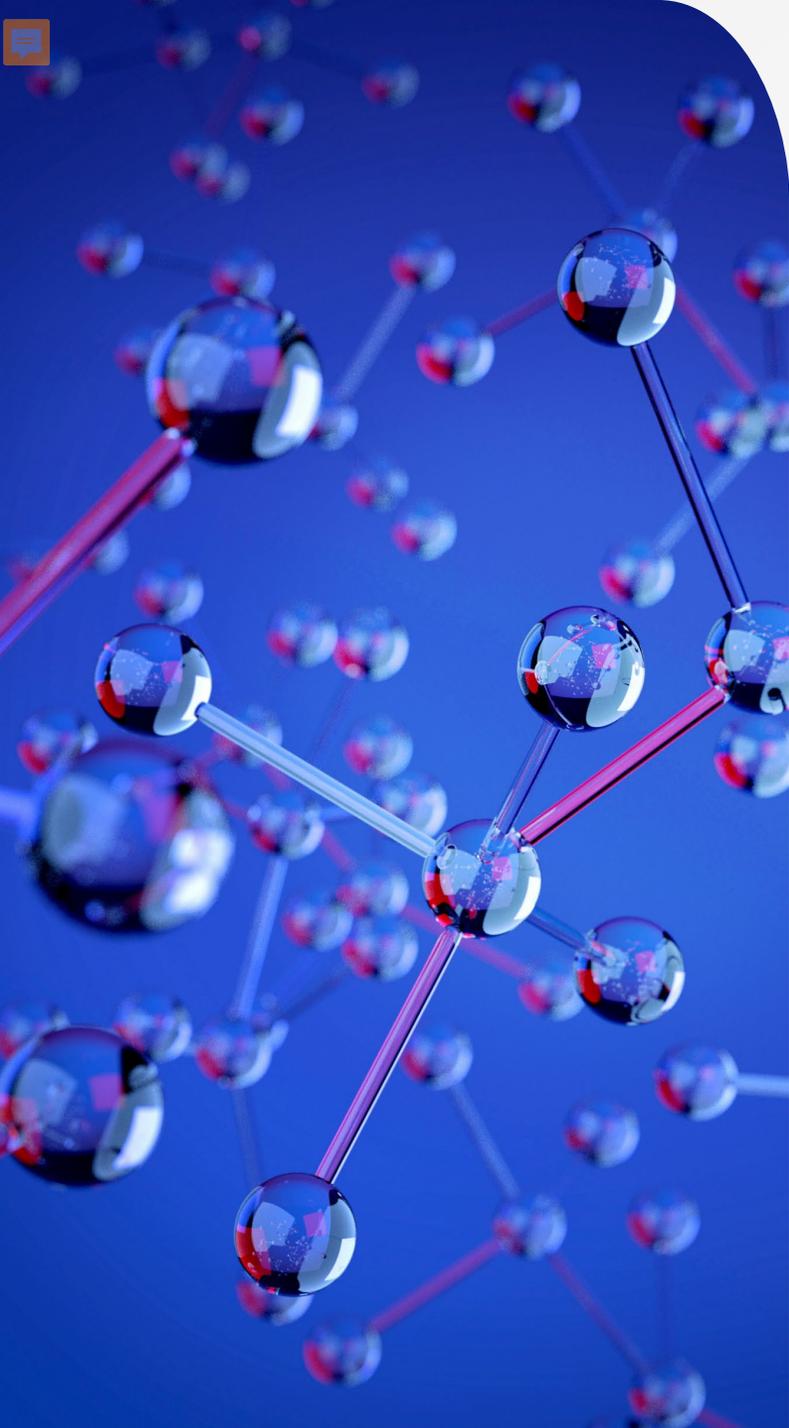
By 2025, it is estimated that 100 million cars in the US will utilize HFOs



Example:

HFOs replacing R-134a for auto A/C, have a low GWP:

- R-134a: 1,300
- HFO: 4



ACC Comments on July 2023 Risk Management Proposal for CTC

- EPA's conclusions on the toxicity of CTC are not supported by the "best available science" or the "weight of the scientific evidence"
 - EPA failed to follow its own guidance in interpreting the animal tumor data
 - EPA abandoned its preferred approach in calculating the potential health risk
- The ECEL of 0.03 ppm is not consistent with those of other authoritative bodies
- EPA's assessment of dermal exposures is flawed
- Additional conditions of use should be allowed to demonstrate compliance with the ECEL
- Establishing a de minimis exclusion is essential
- Multiple implementation requirements and timelines require revision
- EPA's fenceline screening analysis is not suitable to inform risk management

PRINCIPAL FACTORS IN IMPLEMENTING ECELS

De Minimis Level

Set a *de minimis* threshold as early in the process as possible

Control Band by Task Approach

Focus on task-based scenarios that occur in well-characterized similar exposure groups; continue to allow use of assigned protection factors (APFs)

Allow Refinement of ECEL

Consider the actual time spent completing tasks with potential exposure, rather than assuming full-shift exposure

Realistic Implementation Time for ECELS

Establish realistic timelines to support successful compliance against an ECEL value

Regulated Areas

Establish steps for newly regulated areas to achieve de-regulation status