



Chlorine
Panel

Perchloroethylene (PCE) - TSCA Section 6 Risk Management Rule

July 17, 2024



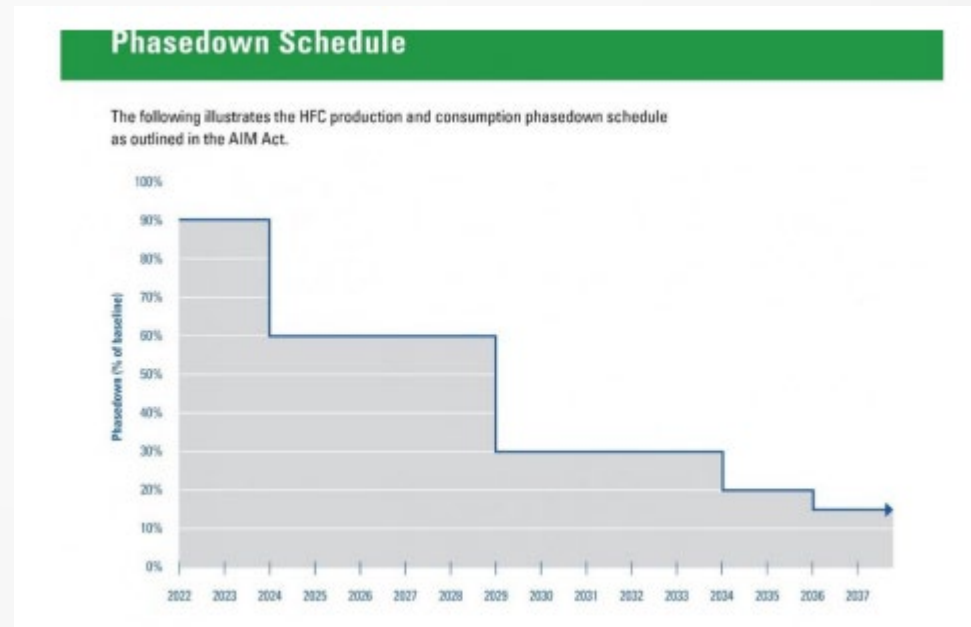
Conditions of Use – Perchloroethylene

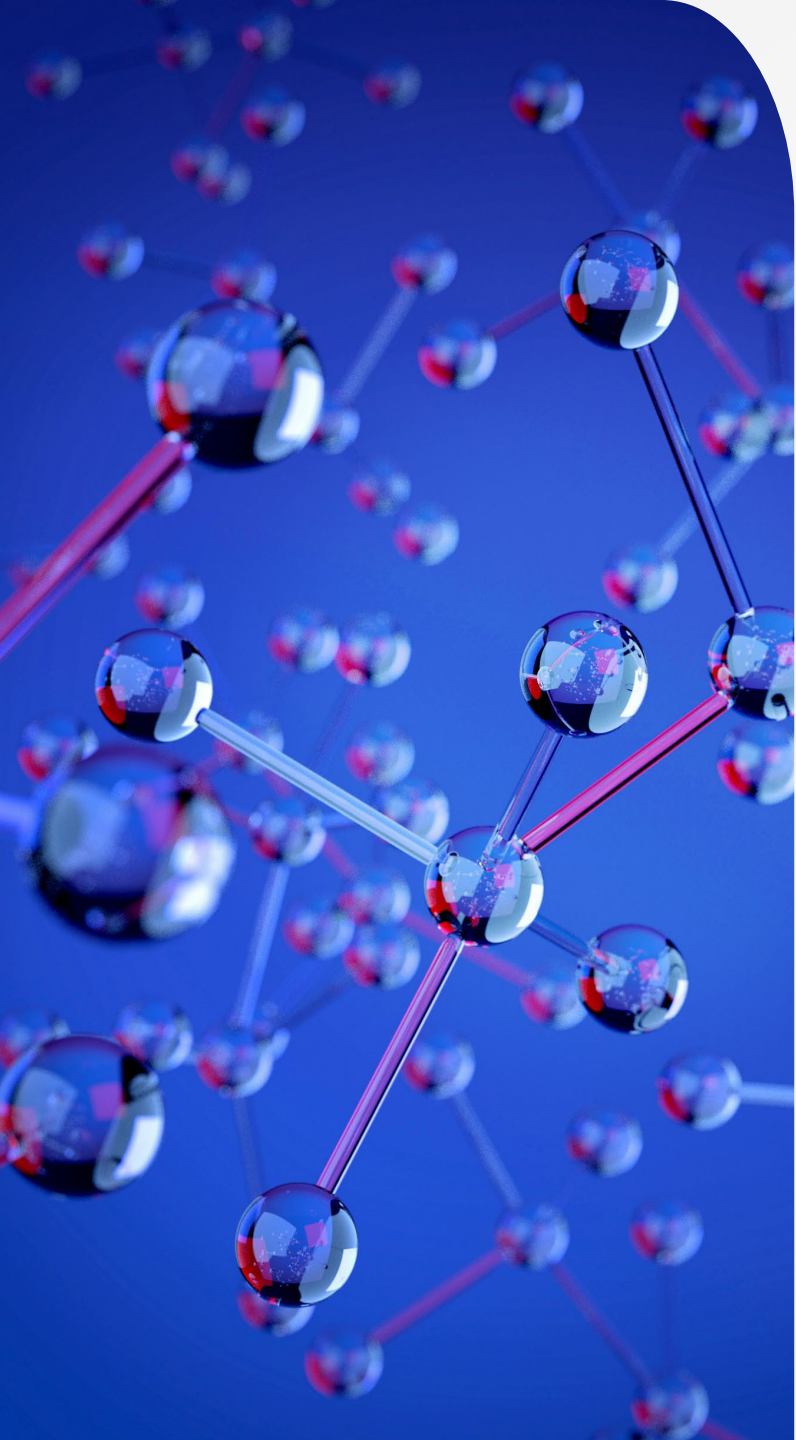
- Feedstock for the manufacture of hydrofluorocarbons (HFCs)
 - used in low global warming potential (GWP) blends for refrigeration/foam blowing
- As a processing aid in -
 - manufacture of agricultural chemicals
 - chemical products and preparations



HFC Manufacture

- HFC manufacture is critical to meeting the objectives of the –
 - American Innovation and Manufacturing (AIM) Act
 - Kigali Amendment to phase down high GWP substances.





ACC Comments on June 2023 Risk Management Proposal for PCE

- EPA's conclusions on the toxicity of PCE do not reflect the best available science or the weight of scientific evidence
 - Assessment of central nervous system (CNS) effects misinterprets the available data
 - Animal liver tumors are not relevant to humans
- The ECEL of 0.14 ppm is not consistent with other authoritative bodies
- Establishing a de minimis exclusion is essential
- EPA's assessment of PCE alternatives is inadequate
 - Failed to consider flammability
 - For example, cleaners for energized electrical equipment
- Multiple implementation requirements need revision
 - Existing monitoring methods are not adequate



Implementing the ECEL for PCE

- Focus on task-based scenarios that occur in well-characterized similar exposure groups (control banding)
 - Continue to allow use of assigned protection factors (APFs) for respiratory protection
- Consider the actual time spent completing tasks with potential exposure, rather than assuming full-shift exposure
 - Regulatory ECEL “could differ from the occupational exposure value calculated in the risk evaluation based on additional consideration of exposures and non-risk factors consistent with TSCA section 6(c).” (May 3 risk framework rule)
- Establish realistic timelines to support successful compliance against an ECEL value
 - 12 months to complete initial monitoring
 - 36 months for implementation of a workplace chemical protection plan (WCPP)
- Establish steps for newly regulated areas to achieve de-regulation status