

Ms. Diane Sheridan  
USEPA, CIBC  
1200 Pennsylvania Ave., NW  
Mail Code 7404, Room 6428  
Washington, DC 20460

Sent by E-mail to Sheridan.diane@epa.gov

**EPA-HQ-OPPT-2008-0319**

August 13, 2008

Dear Ms. Sheridan:

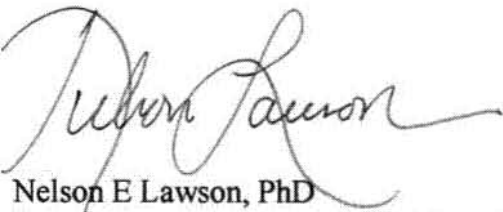
The Pine Chemicals Association is a trade association comprised of 55 producers of natural chemical products derived from trees. The value of its products in the United States alone exceeds one billion dollars and the industry provides employment for about six thousand workers. It has a long history of positive interactions with USEPA on a variety of regulatory issues - especially those concerned with the Toxic Substances Control Act (TSCA) where our input has been appreciated. We would like to take the opportunity to comment on the USEPA proposals for the TSCA Inventory Reset.

1. First, by way of background, we believe that the timing of this initiative needs to be thoughtfully debated. Our companies have fewer regulatory persons than in the past due to industry consolidation. We are very busy dealing with REACH and, with limited regulatory resources, cannot handle another major initiative especially if it has a short timeline. In any case we recommend that, where possible, any new program be done in a voluntary HPV-like way, rather than by increased regulations.
2. Having a substance pre-approved under TSCA for immediate production has been valuable in our industry with its rapidly changing customer demands. For example, small additions of another substance can be made during production to bring a batch into specification without creating a TSCA violation if that change is already encompassed by an approved TSCA Inventory entry. Only a Notice of Commencement (NOC) is required, if one had never been filed. Better production efficiency and customer responsiveness are the results.

3. Already approved but inactive TSCA chemicals should not be removed from the TSCA Inventory but, if necessary, be moved to an "inactive list." We recommend using existing mechanisms such as the Inventory Update Rule (IUR) to determine candidates to move to the "inactive list." We do not support a new inventory reporting process nor shortening the time-line from that currently required under the IUR.
4. Polymers are exempt from reporting under IUR and from PMN in some cases, and in general are believed to be of lower risk. As such, EPA should NOT focus its initial efforts on polymers.
5. Chemicals with *existing* TSCA approval that are moved to the "inactive list" should have a simplified and shortened procedure for re-instatement to the "active list." We recommend that there be a simplified Notice of Commencement with immediate conditional ability to manufacture; USEPA could then request additional data with potential stopping of production if the data were not forthcoming. Fees should be minimal or zero, since in many cases they were already paid for when the original PMN was filed.

Thank you for the opportunity to comment. We are always available to provide any clarification required. Please call me at 912-598-8570.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nelson E. Lawson".

Nelson E Lawson, PhD  
Chairman, Environmental, Health and Safety Committee  
Pine Chemicals Association

cc. Walter Jones