

September 08, 2011

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Environmental Assistance Division
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
East Building
1200 Pennsylvania Avenue, N.W. (MC7408M)
Washington, D.C. 20460

Re: Identifying Priority Chemicals for Review and Assessment

Posted to: <http://blog.epa.gov/chemprioritization>

E-Mailed to: Giamporcaro.David@epamail.epa.gov

Dear Mr. Giampocoro:

The Pine Chemicals Association (PCA) welcomes this opportunity to provide comments on the Agency's proposed identification of priority chemicals for review and assessment. We are particularly concerned about the proposed use of the Canadian Categorization lists to determine which chemicals deserve high priority.

The (PCA) is an international trade association comprised of fifty companies related to producing or using natural chemical products derived from trees. These are used in products as diverse as inks, paints, adhesives, lubricants, diesel fuel, fragrances and even cholesterol-reducing agents for human consumption. Our members were part of the "green products" industry many decades before the term was ever used. The value of our products in the United States alone exceeds one billion dollars and the industry provides employment for about six thousand workers. Our association has had a long history of positive interactions with the United States Environmental Protection Agency particularly those concerned with the Toxic Substances Control Act (TSCA). We were also one of the first industry groups to both sign up for and to complete the High Production Volume Challenge program. We are one of the eighty-four trade associations belonging to the American Alliance for Innovation.

As you know, Environment Canada (EC) used a suite of computer models to estimate the

persistence, biodegradability and inherent toxicity of approximately 23,000 chemicals on its Domestic Substances List. Due to lack of manpower there was no effort to check these results against published data. These classifications were published in 2005. The PCA carefully reviewed these for substances of interest to the pine chemicals industry and concluded that many of the classifications were incorrect when compared to data submitted to the USEPA under the High Production Volume Challenge program, or to other studies in our files.

EC grouped those substances that their computer models designated as persistent + bioaccumulative + inherently toxic (PBiT chemicals) in “batches” of 10-15. These substances were designated as priority chemicals for further assessment and possible restriction if industry did not respond with contrary data. Of the PBiT chemicals in batch 10, released June 20, 2009, five were related to the pine chemicals industry: Four of these were hydrogenated rosin and its esters. (The fifth was the barium salt of fumarated rosin that no one seemed to make or import into Canada anymore).

- **Rosin, hydrogenated** 65997-06-0
- **Resin acids and Rosin acids, hydrogenated, esters with pentaerythritol** 64365-17-9
- **Resin acids and Rosin acids, hydrogenated, esters with glycerol** 65997-13-9
- **Resin acids and Rosin acids, hydrogenated, esters with triethylene glycol** 68648-53-3

PCA provided data and reports to convince EC that these four substances presented no danger to the environment. We have agreed that they do not biodegrade rapidly, but we presented data and arguments to show that they do not bioaccumulate and are not inherently toxic. So in EC's lexicon of terms (PBiT) they are P, but not B or iT, and thus not a risk to the environment.

Environment Canada conducted a science-based screening assessment of these four substances to address potential for harm to the general population (not including workplace exposures) and the environment. The results of the draft screening assessment, published June 26, 2010 indicated that although they have the potential to remain in the environment, they are not expected to accumulate in organisms. Furthermore, the quantities that may be released to the environment are below the levels expected to cause harm to organisms.¹ The final assessment was published January 15, 2011.

More broadly the arguments that PCA used should also apply to many of the other rosin-based chemicals in Environment Canada's list that were designated as some combination of two of the

¹ <http://www.chemicalsubstanceschimiques.gc.ca/challenge-defi/summary-sommaire/batch-lot-10/four-quatre-eng.php>

three PBiT designations.

Finally, registration of the 1000 tonne band of chemicals under the REACH program in Europe has generated new test results that should be taken into consideration before USEPA decides on a prioritization program of its own. For example, rosin itself was found to biodegrade within a reasonable time under the right conditions

If we can be of further help or to obtain more details please contact Dr. Nelson Lawson the Chairman of our Environment, Health & Safety Committee at 912-598-8570 or lawsonconsulting@comcast.net.

Yours truly,

A handwritten signature in black ink, appearing to read "Nelson Lawson". The signature is fluid and cursive, with the first name "Nelson" written in a larger, more prominent script than the last name "Lawson".

Nelson E. Lawson, PhD
Chairman, Environment, Health & Safety Committee
Pine Chemicals Association, Inc.

cc. Amy Duvall, American Association for Innovation