VISION
EXTRUSIONS GROUP LTD.

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3/6/2025

Marcy Card, Ph.D.
Existing Chemicals Risk Assessment Division (7403M)
Office of Pollution Prevention and Toxics
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

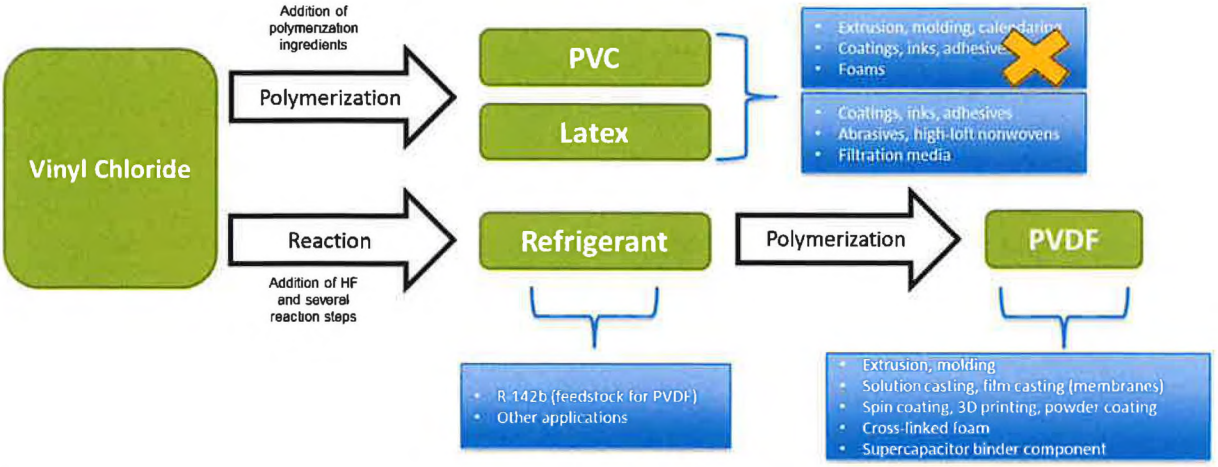
**Re:Vision Profile Extrusions USA Limited-Delmont Comments on the Draft Scope of the Risk Evaluation for Vinyl Chloride (CAS RN 75-01-4); EPA-HQ-OPPT-2018-0448**

Dear Dr. Card:

Vision Profile Extrusions USA Limited-Delmont is the manufacturer of PVC profile lineals used to make a variety of building products, primarily window & door frames, fence deck & rail systems, wall liner panels, and more. We strive to develop innovative PVC extrusion solutions in response to our customer needs and rapidly evolving industry trends. An entrepreneurial spirit and customer focus is found throughout our organization at all levels. Vision Profile Extrusions USA Limited-Delmont has about 160 employees and recognizes approximately $52MM in sales.

We wish to express support for the positions developed by the Vinyl Institute (VI) on the draft scope of the U.S. Toxic Substances Control Act (TSCA) risk evaluation for vinyl chloride. Vinyl chloride is an essential commodity chemical that is a vital part of the value chain for many products, including a variety of building products, primarily window & door frames, fence deck & rail systems, wall liner panels, and more. As currently drafted, the articles produced by our industry may be considered a Condition of Use of vinyl chloride to be assessed in the risk evaluation. However, we believe that this could be erroneous, since PVC products may contain at most a trace amount of vinyl chloride, and are safe to manufacture and use. Vision Profile Extrusions uses fully formulated vinyl compounds during the extrusion process. As a result, vinyl chloride can only be present in trace amounts, resulting in a final product with no residual vinyl chloride.

A visual representation of where our products are in the vinyl chloride value chain is below for your reference.




Overall, the inclusion of articles in the draft scope inaccurately overstates the potential risks of the manufacture and use of our products, and therefore should be excluded from the scope.

We strongly agree with VI that EPA must refine and narrow the scope of its planned risk evaluation for vinyl chloride to only focus on the manufacture of vinyl chloride and processing of vinyl chloride into other materials and substances.

EPA should limit its evaluation to conditions of use related to production and processing of vinyl chloride, and should not include any conditions of use related to transportation, emergency situations, or releases that are already regulated under other statutes and authoritative bodies. For example, the U.S. Department of Transportation (DOT) is responsible for issuing regulations to protect against the risks that are inherent in the transportation of hazardous material in commerce. Furthermore, considering the tragic events that occurred in East Palestine, Ohio in February 2023, the official report on the rail incident by the National Transportation Safety Board (NTSB) strongly indicates that the cars carrying vinyl chloride had functioned properly, and that the vent-and-burn decision made at the scene was not necessary. TSCA is a gap-filling statute, intended to regulate only exposures and conditions of use that are not adequately addressed under other laws.

With respect to occupational exposures, EPA incorrectly assumes that vinyl chloride is present at 0.1% (1000 ppm) in a PVC product when vinyl chloride is not specifically listed on a product Safety Data Sheet (SDS). This assumption ignores the existing regulatory framework governed by the Clean Air Act, where residual vinyl chloride is required to be stripped out of all PVC resin types at sufficiently low levels to ensure worker and user safety[1]. A paper presented at the Society of Plastics Engineers VinylTec conference in 2017 illustrated how the average typical amount of residual vinyl chloride is less than 1.0 ppm across all resin types, and in the most commonly used PVC resin type it is below 0.3 ppm. The same paper indicates that these average

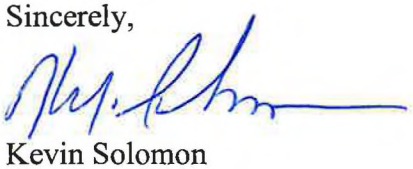
[1] 40 CFR Part 63 Subparts DDDDDD and HHHHHHH

typical residual vinyl chloride monomer levels have improved since 2000 across all resin types, by between 35% and 77% lower presence.

For a variety of building products, primarily window & door frames, fence deck & rail systems, wall liner panels, and more, we characterize the safety of our products using SDS methodology. We are fully aware that PVC resin has already been stripped of vinyl chloride, and we purchase our products with a Certificate of Analysis to demonstrate the low levels of vinyl chloride that are present, if vinyl chloride is detected at all. Since many articles are exempt from the Hazard Communication Standard, there is no need to indicate the level of vinyl chloride on a SDS for these products. Therefore, EPA should correct its faulty assumption in the draft scoping document that articles have a presence of vinyl chloride of 0.1% and should ensure that PVC articles not required to have a SDS are excluded from the scope of the risk evaluation.

We look forward to engaging with the Agency during its years long TSCA section 6 assessment of vinyl chloride.

Sincerely,



Kevin Solomon

General Manager

Vision Profiles Extrusions USA Ltd-Delmont

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