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Comments submitted via the Federal eRulemaking Portal at https://www.regulations.gov

U.S. Environmental Protection Agency
EPA Docket Center
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Vinyl Chloride; Draft Scope of the Risk Evaluation Under the Toxic Substances Control Act (TSCA); Notice of Availability and Request for Comment 90 FR 4738 (January 16, 2025)
Docket: EPA–HQ–OPPT–2018–0448; FRL–12439–01–OCSPP

To Whom It May Concern:

The Chemours Company ("Chemours") submits these comments in response to the U.S. Environmental Protection Agency's ("EPA's or the Agency's") draft scope of the risk evaluation under the Toxic Substances Control Act ("TSCA") for vinyl chloride (the "Notice[1]

Chemours is a global leader in Titanium Technologies, Thermal & Specialized Solutions, and Advanced Performance Materials providing its customers with solutions in a wide range of industries with market-defining products, application expertise and chemistry-based innovations. We deliver customized solutions with a wide range of industrial and specialty chemicals products for markets, including coatings, plastics, refrigeration and air conditioning, transportation, semiconductor and consumer electronics, general industrial, and oil and gas. The company has approximately 6,000 employees and 28 manufacturing sites serving approximately 3,200 customers in approximately 120 countries. Chemours is headquartered in Wilmington, Delaware.

Introduction

A critical responsibility of the Agency is to objectively assess the risk a substance may present under its intended conditions of use, and, when unreasonable risks are identified for certain conditions of use, to impose regulations or restrictions on such uses under Section 6 of TSCA only

[1] U.S. EPA, Vinyl Chloride; Draft Scope of the Risk Evaluation Under the Toxic Substances Control Act (TSCA); Notice of Availability and Request for Comment 90 FR 4738 (January 16, 2025).

to the extent necessary to address any unreasonable risks. Vinyl chloride is used in many applications including, as discussed in detail below, in the production of fluorinated gases that have lower global warming potential ("GWP") and are vital to achieving national and international climate change objectives. Given vinyl chloride's importance throughout the economy, it is critical that EPA's scope of risk evaluation be based on the best available science and consider the impacts of any new control measures to human health, the environment, the economy, and the fundamental credibility of the TSCA risk-management process under the 2016 Lautenberg Act amendments.[2]

Chemours' Use of Vinyl Chloride

Chemours is a leading global provider of low-Global Warming Potential refrigerants and other solutions that are critical to the objectives of the American Innovation and Manufacturing Act ("AIM"), S. 2754, to phase down high-GWP substances and meet requirements of the Significant New Alternatives Policies ("SNAP") program under the Clean Air Act ("CAA").

Vinyl chloride is a critical feedstock for hydrofluorocarbon ("HFC") production and is used at one of Chemours' manufacturing locations. Chemours uses vinyl chloride as a key feedstock to domestically manufacture a product used in various market applications including propellants and foam insulation. The use of vinyl chloride in making low-GWP propellants and foam blowing agents is important to achieving the phase down goals of the AIM Act.

In recent Section 6 Final Risk Management Rules, EPA has recognized the critically of the continued use of carbon tetrachloride and PCE as a feedstock for the domestic manufacture of low-GWP products to address the phasedown of climate-damaging HFCs under the AIM Act and the Kigali Amendment to the Montreal Protocol on Substances that Deplete the Ozone Layer.

Therefore, Chemours strongly supports the continued use of vinyl chloride as a feedstock to produce low-GWP propellants and foam blowing agents.

Chemours' Operations

Vinyl chloride at our manufacturing facility is piped directly into the closed process and there is no storage of vinyl chloride on-site. The process is a closed system with engineering controls that are designed to prevent potential industrial emissions and exposures. As a raw material, vinyl chloride is consumed in the closed process to manufacture another substance. Any reaction vent streams from this closed process are directed to an air pollution control device.

Health and Safety

In addition to engineering controls, workers are required to wear Personal Protection Equipment ("PPE") when performing short duration sampling activities of the final product that is manufactured using vinyl chloride. There are no routine operator tasks involving potential

[2] Public Law No: 114-182.

exposure to vinyl chloride. Non-routine maintenance activities, if performed, would include supplied air respiratory protection and full acid suit for dermal protection after line venting and decontamination procedures are followed.

OSHA regulates potential employee exposures to vinyl chloride in the Expanded Health Standard 1910.1017 - Vinyl chloride. Chemours has a robust monitoring, audit, and employee health and safety training program to ensure compliance with OSHA 1910.1017.

Conclusion

Chemours appreciates the opportunity to provide written comments to inform the Agency's efforts to establish the scoping for the risk evaluation for vinyl chloride. Chemours would be pleased to meet with EPA personnel to discuss our responsible use of vinyl chloride as a critical feedstock to domestic manufacture of low-GWP products, and the ways in which Chemours protects human health and the environment throughout this process.

Sincerely,

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