



January 23, 2015

Mr. Arnold E. Layne
Director
Office of Information Analysis and Access (Mail Code 2841T)
Office of Environmental Information
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

CC: Daniel R. Bushman, Ph.D.
TRI Petitions Coordinator
Office of Information Analysis and Access (Mail Code 2842T)
Office of Environmental Information
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Transmittal of Petition to Delist EGBE from Certain Glycol Ethers Category on TRI

Dear Mr. Layne and Dr. Bushman:

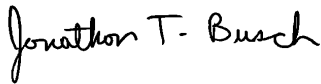
On behalf of its Ethylene Glycol Ethers Panel, the American Chemistry Council (ACC) is pleased to submit the attached petition to the U.S. Environmental Protection Agency (EPA) to remove ethylene glycol monobutyl ether (EGBE) from the category Certain Glycol Ethers under the list of chemicals requiring reporting under the Toxics Release Inventory (TRI) pursuant to Sections 313(d) & (e) of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA).

As the attached petition demonstrates, available scientific data indicate that EGBE poses low potential hazards to human health and the environment, making an assessment of exposure appropriate under EPA's policy for making TRI listing decisions under EPCRA. When EPA proposed to remove EGBE from the Clean Air Act's list of Hazardous Air Pollutants (HAPs) in November 2003, it specifically determined, based on exposure assessments utilizing 1993 TRI data, that there is "reasonable assurance" that any potential adverse human health and environmental effects "will not occur" from EGBE facility releases (68 Fed. Reg. 65648, 65660 (Nov. 21, 2003)). In the final rule, the Agency concluded "with confidence" that releases of EGBE "may not reasonably be anticipated to cause any adverse effects to human health" or "adverse environmental effects" (69 Fed. Reg. 69320, 69322 (Nov. 29, 2004)).

There now is an even stronger basis for making essentially the same statutory findings under EPCRA and removing EGBE from the TRI reporting list. As shown in this petition, EGBE releases and exposures are now lower than those that formed the basis for EPA's HAPs determinations. Delisting under EPCRA would remove a significant disincentive to the use of EGBE, a solvent that has proven to be highly effective in a variety of important water-based coating formulations with demonstrable volatile organic compound (VOC)-reduction benefits. For the reasons set forth in full in this petition, the EPCRA delisting criteria are satisfied and EPA should remove EGBE from the TRI reporting list.

As you know, EPCRA § 313(e)(1) provides that EPA will respond to a petition to add or delete a chemical from the TRI list within 180 days of receipt. In the meantime, ACC would welcome the opportunity to meet with you and the staff who will be responsible for evaluating the petition, in order to discuss methods and findings and to answer any questions. To arrange such a meeting, please contact me at your convenience at (202 249-6725; jon_busch@americanchemistry.com).

Sincerely,



Jonathon T. Busch
Manager, Ethylene Glycol Ethers Panel
Director, Chemical Products & Technology Division