CENTER FOR COALFIELD JUSTICE

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March 18, 2024

Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Docket ID No. EPA-HQ-OPPT-2018-0448-0002

All five chemicals being considered for prioritization under the Toxic Controls Regulation Act need to be designated as High Priority Substances and more strictly regulated. All 5 are either class 1 carcinogens (MBOCA EPA–HQ–OPPT–2023–0464, Acetaldehyde EPA–HQ–OPPT–2018–0497) or class 2 carcinogens (Acrylonitrile EPA–HQ–OPPT–2018–0497, Benzenamine EPA–HQ–OPPT–2018–0474, Vinyl Chloride EPA–HQ–OPPT–2018–0448). The Center for Coalfield Justice adamantly stands for the strict regulation of any carcinogen, especially chemicals with a history of exposure that these five chemicals have. Our organization also makes this recommendation based on their use in the production of resins, polymers, polyurethanes, and synthetic rubber, in favor of less harmful, more environmentally safe, sustainable materials. All five chemicals have precedence of toxic effects and serious biological harm when released, such as the 1999 acrylonitrile leak from an industrial polymer plant in Turkey, the 2023 vinyl chloride spill in East Palestine, Ohio and the high levels of bioaccumulation all five chemicals exhibit. The Environmental Protection Agency has the responsibility of regulating and protecting the unalienable rights of the citizens of the United States: life, liberty, and the pursuit of happiness as well as, the Pennsylvania rights to natural resources and the public estate, to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Without the strict regulation of these substances, the EPA would not be able to uphold that mission.

Sincerely,
Jason Capello
Community Advocate
Center for Coalfield Justice