



# CENTER FOR COALFIELD JUSTICE

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October 23, 2024

**Michal Ilana Freedhoff, Assistant Administrator**

United States Environmental Protection Agency  
Office of Chemical Safety and Pollution Prevention 7101M  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**RE: EPA-HQ-OPPT-2023-0601 - Proposed High-Priority Substance Designations under the Toxic Substances Control Act (TSCA)**

CCJ is a Pennsylvania-incorporated not-for-profit organization with federal Internal Revenue Service § 501(c)(3)-status recognition located in Washington, PA. Our mission is to “improve policy and regulations for the oversight of fossil fuel extraction and use; to educate, empower and organize coalfield citizens; and to protect public and environmental health.” CCJ has over three thousand members and supporters and is governed by a volunteer Board of Directors.

Thank you for the opportunity to provide input on the designation of vinyl chloride as a high-priority substance. The Center for Coalfield Justice (“CCJ”) respectfully submits the following comments.

Vinyl Chloride is a highly dangerous substance that should be regulated to the full extent of EPA’s power. In the wake of the disaster in East Palestine, many people became aware of the dangers of being exposed to vinyl chloride, which can lead to serious long-term and short-term health effects. Long-term exposure can lead to various cancers, liver disease, neurological and/or behavioral issues, and more. Even short-term exposure can cause someone to feel sick including dizziness, headaches, fatigue, and potential loss of consciousness.

Even though vinyl chloride is a harmful substance, people are exposed to it every day because it is a necessary component of PVC plastic, which is used in many consumer products and construction materials. The EPA must seriously consider and address the impacts that products made from vinyl chloride have on human health and the environment, and for unnecessary and avoidable uses<sup>1</sup>, consider banning vinyl chloride. In addition, the EPA must consider all impacts, upstream and downstream, from vinyl chloride when deciding on its designation. This includes the production of vinyl chloride, the production of goods made from vinyl chloride, and the impacts of being exposed to those goods.

Thank you for your consideration. If you have any questions, please contact me anytime.

Respectfully,

**Nina Victoria, J.D.**  
Community Advocate

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<sup>1</sup> Examples of unnecessary and avoidable uses include water bottles, clothing, children’s toys, flooring, food-contact materials, vinyl car interiors, credit and gift cards, shower curtains, wallpaper, upholstery, and raingear.

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