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April 2, 2025

Marcey 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: NRCA's 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:

The National Roofing Contractors Association (NRCA) expresses our 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, especially those in roofing materials and systems.

Established in 1886, NRCA is one of the nation's oldest trade associations and the voice of roofing professionals worldwide. Our nearly 4,000 member companies represent all segments of the industry, including contractors, manufacturers, distributors, consultants, and other employers in all 50 states and internationally. NRCA members are typically small, privately held companies with the average member employing 45 people and attaining sales of \$4.5 million per year. The U.S. roofing industry is an essential \$100 billion sector with nearly one million employees that provides critical materials and services to ensure home and business safety.

Overall, the inclusion of articles in the draft scope inaccurately overstates the potential risks of the manufacture and use of our products. We strongly agree with VI that only a qualitative review of available data on any residual VCM in downstream PVC is warranted or necessary. We are confident that based on the best available science and weight of the scientific evidence, the risk evaluation will affirm that the production, use, and disposal of vinyl chloride is safe.

EPA should limit its quantitative 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. 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 used PVC resin type it is below 0.3 ppm. The same paper indicates that these average typical residual vinyl chloride monomer levels have improved since 2000 across all resin types, by between 35% and 77% lower presence.

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.

Thank you for considering our organization's comments on this critical issue. If you have questions or need more information, please contact Deb Mazol ([DMazol@nrca.net](mailto:DMazol@nrca.net)) in our Washington, D.C. office at (202) 546-7584.

Sincerely,

A handwritten signature in black ink, appearing to read "Deb Mazol", written in a cursive style.

Chief Executive Officer