



August 19, 2015

Mr. Greg Schweer, Chief
New Chemicals Management Branch
Office of Pollution Prevention and Toxics (OPPT)
US Environmental Protection Agency
Washington, DC 20460

RE: Toxic Substances Control Act for medium-chain and long-chain chlorinated paraffins

Dear Mr. Schweer:

On behalf of the member companies of the American Wire Producers Association (AWPA), we submit comments on the Environmental Protection Agency's (EPA) pending review of the Pre-Manufacture Notice (PMNs) under the Toxic Substances Control Act (TSCA) for medium-chain and long-chain chlorinated paraffins (MCCP and LCCP). We understand that the Agency is considering eliminating these products from US commerce after May 2016 with no stakeholder input or through a transparent review process. The wire and wire products industry, especially stainless wire manufacturers, uses metalworking fluids that contain MCCPs and LCCPs, and therefore we are very concerned about this pending action.

Background:

The AWPA is a trade association which represents companies that collectively produce more than 80% of all carbon, alloy and stainless steel wire and wire products in the United States. The 88 member companies of the AWPA employ more than 22,000 workers in over 215 plants and facilities located in 35 states and 140 Congressional Districts. The industry generates over \$9.1 billion in Annual Sales.

American wire and wire products manufacturers are entrepreneurial and work hard to maintain their competitive market position despite heavy import competition of their products. They pride themselves on their high productivity and constant reinvestment in the latest technology and equipment, keeping the American wire industry one of the most globally competitive segments of the steel industry.

The wire and wire products industry uses metalworking fluids that contain MCCPs and LCCPs in several applications including stainless wire drawing. It has been found to be the best lubricant and they are essential to allow for cutting, grinding and machining of parts with precision and efficiency necessary to make these products that are then used

in a host of industries, including construction, automotive, oil and gas, aerospace and defense.

Critical Uses:

The use of chlorinated paraffins is paramount to stainless and nickel alloy cold finished production and fabrication. It is used as a high pressure additive (HPA) in metal working and metal cutting fluids. Specifically, the fluids that contain chlorinated paraffins are used as wire and bar drawing lubricants to pull wire or bar through a die to decrease the diameter or alter the shape of the wire or bar; as metal cutting fluids used in machining and cutting of these alloys, and cold fabrication methods such as cold heading, spinning drawing, etc. Denying access to those HPAs, with no alternatives, will have a serious adverse impact on the ability of stainless wire and wire products manufacturers to fabricate and process the steel.

Furthermore, suppliers to the stainless steel wire industry have indicated that at this time there is no available substitute. Manufacturers need the oily lubricant (as opposed to a powder whose performance is not as good) to process their steel effectively. If a suitable lubricant is not available, these manufacturers will suffer a serious disruption in their manufacturing processes and ability to continue operations.

Disposal Methods:

In production, these fluids are readily captured through bulk part cleaning methods and contained within the waste stream. In the vast majority of manufacturing facilities, liquid waste stream containing chlorinated paraffin products is treated and filtered to remove them from the liquid waste stream prior to discharge to a municipality. The resulting solid waste is then disposed of properly according to EPA rules and guidelines.

Transition Time:

The AWPA companies that use MCCPs and LCCPs cannot transition their production process without adequate time, and certainly not in less than one year. At a minimum, companies would need five years to test and validate new fluids and make any necessary re-tooling and production changes. Without a reasonable transition time, US wire and wire products manufacturers that use metalworking fluids with MCCPs and LCCPs would be at a serious competitive disadvantage to foreign competitors.

Stakeholder Input:

EPA has chosen to review these products under the PMN process meaning that they are essentially new products. However, MCCPs and LCCPs have been in commerce for over 70 years and it is our understanding that EPA has actually been reviewing this class of chemistry since the 1970s. For that reason, we would ask that EPA proceed under a Peer Review Plan as outlined under the TSCA Chemical Work Plan program before taking any final action. It is critical that the many stakeholders and downstream

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users of these products be able to comment and that they be given any new data on environmental exposures from MCCP and LCCP that EPA believes to be occurring so that they can provide pertinent additional information.

Failure to allow for public notice and comment period will have excluded important stakeholders and downstream industries dependent on these products to manufacture critical components in a host of industries. It also does not allow a transparent review of the science behind EPA's decision to ban MCCP and LCCP.

Thank for your consideration of these requests. I look forward to working with you on this issue. If you need more information or have additional questions, please contact Janet Kopenhaver, AWPA's Director of Government Relations at 703-528-7822.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberly Korbel', written in a cursive style.

Kimberly Korbel
AWPA Executive Director

Copy: Mr. Ken Moss, EPA Office of Pollution Prevention and Toxics