

July 21, 2015

The Honorable (Full Name)
(Room #)(Name) House Office Building
United States House of Representatives
Washington, DC 20515

Dear Representative _____:

I am writing to ask you to join a letter to the Environmental Protection Agency (EPA) being circulated by Rep. Robert Gibbs. EPA is using an unprecedented regulatory process to eliminate substances known as "medium-chain chlorinated paraffins" (MCCPs) and "long-chain chlorinated paraffins" (LCCPs) from U.S. commerce after May 31, 2016, and this action will directly and adversely affect the U.S. economy and jobs. Rep. Gibbs' letter asks the Agency to explain its regulatory path that seems inappropriate to me.

Our company, which is headquartered in your District, manufactures and sells metalworking fluids (MWFs) that are used by our end-user customers in a multitude of manufacturing applications to shape and form metals (such as automobile fenders) and fabricate metal parts (such as fasteners used in both commercial and military aircraft). MCCPs and LCCPS are used in these MWFs as "extreme pressure additives" to enhance lubricity so that machine components do not break down under the extreme pressure necessary to make the finished metal parts to required specifications.

MCCPs and LCCPS have been used in MWFs for decades because of their cost-effective performance and because of environmental, health and safety issues with specific, alternative chemistries. Ignoring this lengthy, in-use history, EPA is using the "new chemicals" review process under Section 5 of the Toxic Substances Control Act (TSCA) to eliminate the U.S. production and use of MCCPs and LCCPs from U.S. commerce after May 31, 2016. TSCA Section 5 allows EPA to make "unreasonable risk" determinations on new chemicals not previously introduced into commerce without first seeking public comment or peer-review of the science. While the Agency's TSCA Section 5 approach is "creative," it effectively precludes or limits our company and other downstream users' participation.

A significant problem we face from the May 31, 2016 deadline is that acceptable replacements for MCCPs and LCCPs in MWFs take time to develop and field test. In addition, many uses require third-party approvals or certifications. We are years, not months, away from a transition from MCCPs and LCCPs.

I would hope that you would review Rep. Gibbs' proposed letter to EPA and, in light of the above, join him in asking the Agency to explain its actions.

Sincerely,