

September 29, 2017

U.S. Environmental Protection Agency  
EPA Docket Center  
EPA-HQ-OAR-2014-0471  
Mail Code 28221T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2014-0471.

*RE: Draft Notice of the Environmental Protection Agency's Rationale for Granting Petitions to Add n-Propyl Bromide to the List of Hazardous Air Pollutants*

Dear Sir/Madame:

The Northeast States for Coordinated Air Use Management (NESCAUM) offers the following comments on the U.S. Environmental Protection Agency's (EPA's) request for comment on the New York State Department of Environmental Conservation (NYSDEC) and Halogenated Solvents Industry Alliance, Inc. (HSIA) petitions to add n-propyl bromide (nPB) to the list of hazardous pollutants regulated under section 112 of the Clean Air Act (CAA) [80 Fed. Reg. 6676-6679 (February 6, 2015)]. NESCAUM is the regional association of state air pollution control agencies representing Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

NESCAUM is writing in support of the draft notice from the EPA published January 9, 2017 describing the rationale for granting the petition to add nPB, also known as 1-bromopropane (1-BP) (Chemical Abstract Service No. 106-94-5), to the list of hazardous air pollutants (HAP) contained in section 112(b)(1) of the CAA. NESCAUM has previously submitted comments in March 2015 to support the petitions submitted by NYSDEC and HSIA which included the following information:

- Background data on nPB, including chemical properties, physical properties, production data, and use data;
- Toxicological evidence describing the human health effects of nPB;
- Estimation of a cancer inhalation unit risk;
- nPB emissions estimates and atmospheric dispersion modeling estimating potential ambient concentrations of nPB adjacent to facilities that emit it; and
- Characterization of potential risks to human health due to potential exposure to ambient air concentrations of nPB
- A strong basis for listing nPB as a section 112 HAP. It summarized the growing amount of toxicological data on the adverse health effects of nPB exposures, including

carcinogenicity. This also included the increasing evidence that nPB is a hazardous chemical that should be regulated to prevent occupational exposure, as well as, exposure of the general public and sensitive populations to unregulated vented or fugitive nPB emissions.

Given that section 112 authorizes the petitioning of the Administrator to add a substance to the CAA HAP list if there is sufficient data demonstrating that the substance is known to cause or may be reasonably anticipated to cause adverse human health or environmental effects, NESCAUM supports the NYSDEC and HSIA petitions which not only effectively summarizes the toxicological concerns associated with nPB exposures, but also sufficiently demonstrates the adverse effects of the potential future use of and exposure to nPB if this pollutant is not added to the CAA HAP list for regulation under section 112.

NESCAUM not only supports these petitions to add nPB to the CAA section 112 HAP list but also the position that EPA has taken based on its evaluation of the petitioners concerns over potential hazards, emissions, and atmospheric dispersion modeling that provided estimates of ambient concentrations of nPB, as well as the conclusion that the EPA has determined that there is adequate evidence to support a determination that emissions and ambient concentrations of nPB may reasonably be anticipated to cause adverse health effects.

Sincerely,

A handwritten signature in cursive script, appearing to read "Arthur Marin".

Arthur Marin  
Executive Director  
NESCAUM

Cc: NESCAUM State Air Director  
NESCAUM Air Toxics and Public Health Committee