



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: EPA Discussions with *ortho*-Phenylphenol and Salts Antimicrobial Registrants on Anticipated Mitigation for the Proposed Interim Decision
June 23 and June 30, 2020
Conference Call

Attendees

- Companies present: LANXESS (Luanne Jeram, Christine Kliche-Spory), DuPont Nutrition and Biosciences (Lina Bueno), QuestSpecialty (Mitch Whitney), Amrep (represented by Connie Welch-duJardin and Nelson Cornwell of toXcel, LLC)
- EPA: Richard Fehir, Jose Gayoso, Kimberly Wilson

Background

The agency initiated two conference calls on June 23 and 30, 2020 to discuss anticipated regulatory measures to reduce human health risks posed by products containing *ortho*-Phenylphenol (O-PP) or its sodium or potassium salts. The draft risk assessment for O-PP and salts¹ identified numerous uses with risks of concern in residential and occupational settings.

Meeting Discussion

- EPA presented the anticipated risk mitigation and asked for input from registrants on real world impacts and if they are supportive of what is anticipated to be in the Proposed Interim Decision. Measures include maximum application rate reductions, closed loading and delivery, and label clarifications, among other risk mitigation.
- Registrants provided their feedback on the feasibility of the potential mitigation and identified aspects of proposed measures that need further clarification for successful implementation.

Action Items

- Registrants are planning to propose quantified reduced maximum application rates for several uses to address inhalation and dermal risks, but still maintain product efficacy. They are also aware of clarifications the agency needs on how O-PP is applied to preserve metalworking fluids in the field and are checking with their contacts. This context may refine the occupational exposure to machinists.
- The agency plans to engage registrants with fogging and carpet deodorizer uses of O-PP and salts to go over mitigation options.

¹ For additional information, the draft risk assessment and all other documents pertaining to the registration review of O-PP and salts are available in docket ID EPA-HQ-OPP-2013-0524 at www.regulations.gov.