



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

July 27, 2023

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mr. David Isaacs  
Semiconductor Industry Association (SIA)  
1101 K Street NW, Suite 450  
Washington, DC 20005

Dear Mr. Isaacs:

This letter is the response to the Request for Correction (RFC), dated June 3, 2021, and assigned **RFC # 21004** for tracking purposes<sup>1</sup>, that was submitted to the U.S. Environmental Protection Agency pursuant to EPA's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the EPA (EPA IQG)<sup>2</sup>. In the RFC, the SIA seeks the correction of information in the following EPA document disseminated by the Office of Pollution Prevention and Toxics:

“Risk Evaluation for n-Methylpyrrolidone (2-Pyrrolidinone, 1-Methyl-) (NMP), CASRN: 872-50-4 issued pursuant to section 6 of the Toxic Substances Control Act (TSCA) in December 2020 (herein after referred to in this response as the “NMP Risk Evaluation”)<sup>3</sup>.

In requesting that the NMP Risk Evaluation be corrected, the SIA claims the following two “key deficiencies”:

- (1) EPA did not use the high-quality data and information provided by the SIA; and
- (2) EPA's assumptions about surface area and duration of exposure are incorrect and do not occur in the semiconductor industry.

The EPA IQG outlines administrative mechanisms for the EPA's pre-dissemination review of information products and describes mechanisms to enable affected persons to seek and obtain corrections from the EPA regarding disseminated information that they believe does not comply with the EPA IQG or Office of Management and Budget (OMB) guidelines (i.e., OMB Information Quality Guidelines and Memorandum M-19-15)<sup>4</sup>. EPA is committed to applying these guidelines, including each of the updates outlined in M-19-15 to the EPA IQG. The RFC process under the EPA IQG is intended to provide a mechanism to correct errors where the disseminated product does not meet information quality standards. The EPA IQG specifically states that it is not intended to duplicate or

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<sup>1</sup> A copy of the RFC is posted on the EPA IQG site at: <https://www.epa.gov/quality/rfc-21004-n-methylpyrrolidone-nmp>.

<sup>2</sup> <https://www.epa.gov/quality/guidelines-ensuring-and-maximizing-quality-objectivity-utility-and-integrity-information>.

<sup>3</sup> [https://www.epa.gov/sites/default/files/2020-12/documents/1\\_risk\\_evaluation\\_for\\_n-methylpyrrolidone\\_nmp\\_casrn\\_872-50-4.pdf](https://www.epa.gov/sites/default/files/2020-12/documents/1_risk_evaluation_for_n-methylpyrrolidone_nmp_casrn_872-50-4.pdf).

<sup>4</sup> <https://www.whitehouse.gov/wp-content/uploads/2019/04/M-19-15.pdf>.

interfere with the orderly conduct of a process involving public comment opportunities that allow for the correction of any information that does not comply with the Guidelines<sup>5</sup>.

A key component of the TSCA Existing Chemical Evaluation process is repeated public comment opportunities that are provided throughout each stage of the process. The public comment process is integrated throughout the 3-stages of the TSCA Existing Chemical Evaluation process. Those public comment opportunities serve the purposes of the EPA IQG by providing opportunities for the correction of any information that does not comply with the Guidelines. Public comment data, including EPA's responses, are made available through the web interface Regulations.gov, bulk comment data download feature, and Application Programming Interface (API).

After review of this RFC, EPA has determined that SIA's comments submitted on January 21, 2020 pertaining to the deficiencies listed above were reviewed and addressed with response in the context of the TSCA Existing Chemical Evaluation process (see response to peer review and public comments document pp 56-63, 71 for semi-conductor comments with specific responses<sup>6</sup>). EPA has concluded that the issues raised in this RFC were appropriately addressed in the TSCA Existing Chemical Evaluation public comment period for NMP. EPA has also determined that the public comment period was a more appropriate mechanism for SIA to provide comments and receive a response from EPA, rather than through a separate response mechanism under the RFC process under EPA IQG. As such, EPA is denying your RFC.

Thank you for your interest in EPA's information quality. Should you have questions or need additional information about the EPA's IQG process, you may contact us via email to [quality@epa.gov](mailto:quality@epa.gov) (our preferred method), or via regular mail to the EPA Information Quality Guidelines Processing Staff, Mail Code 2811R, U.S. EPA, 1200 Pennsylvania Avenue, NW, Washington, DC 20460.

Sincerely,

**MICHAL  
FREEDHOFF**

Digitally signed by MICHAL  
FREEDHOFF  
Date: 2023.07.27 15:24:55  
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Michal Freedhoff, Assistant Administrator

cc: Vaughn Noga, Chief Information Officer and Deputy Assistant Administrator for Environmental Information

Katherine Chalfant, Director of Enterprise Quality Management Division, Office of Mission Support

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<sup>5</sup> See Section 8.5 of the EPA IQG.

<sup>6</sup> Link to public comment and response document at: [https://www.epa.gov/sites/default/files/2020-12/documents/2\\_summary\\_of\\_external\\_peer\\_review\\_and\\_public\\_comments\\_and\\_disposition\\_for\\_n-methylpyrrolidone\\_response\\_to\\_support\\_risk\\_evaluation\\_for\\_nmp.pdf](https://www.epa.gov/sites/default/files/2020-12/documents/2_summary_of_external_peer_review_and_public_comments_and_disposition_for_n-methylpyrrolidone_response_to_support_risk_evaluation_for_nmp.pdf).