



*Common Errors Made When
Submitting a PMN*

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Common Errors Made When Submitting a PMN

Strategic Error: Be aware of the environmental concerns for your chemistry

- *Chemicals of Concern List*

- <http://www.epa.gov/opptintr/newchems/pubs/chemcat.htm>

- *PBT Chemicals*

- <http://www.epa.gov/opptintr/newchems/pubs/pbtpolcy.htm>
- 64FR60194-60204, November 4, 1999

Common Errors Made When Submitting a PMN

- *Expected TSCA 5e Action*
 - 5e Order Pending Testing/SNUR
 - *Persistence > 2months*
 - *Bioaccumulation ≥ 1000*
 - *Toxicity*
 - 5e Ban Pending Testing
 - *Persistence > 6 months*
 - *Bioaccumulation ≥ 5000*
 - *Toxicity*

Common Errors Made When Submitting a PMN

- *Chemicals under significant restrictions*
 - PFOS/PFOA
 - Brominated DPO
- *Emerging Areas: Endocrine Disruptors*





Common Errors Made When Submitting a PMN

Use EPA's Tools and Guidance Early

- *PBT Profiler – online*
 - <http://www.epa.gov/oppt/sf/tools/pbtprofiler.htm>
- *EPISuite and other predictive models –download*
 - <http://www.epa.gov/oppt/sf/tools/methods.htm>
- *Guidance Document Webpage*
 - <http://www.epa.gov/opptintr/newchemicals/pubs/guideman.htm>
- *Prenotice Coordinator*



Common Errors Made When Submitting a PMN

If tools predict a problem, address it early

- *If you think PBT Profiler predictions are correct*
 - Consider changing your molecule
 - Commit to “no-release” manufacturing and end use processes
 - Likely to see a Consent Order or SNUR – can your business live with the impact?



Common Errors Made When Submitting a PMN

- *If you think the PBT Profiler predictions are too conservative*
 - Provide Test Data with the PMN



Common Errors Made When Submitting a PMN

Strategic Error: Be aware of EPA's concerns for the end-use of your product

- *Replacement for a banned or restricted substance?*
 - Understand EPA's concerns and address them in your PMN
 - Be sure your substance makes things better
 - Be prepared to submit data to prove your claims

Common Errors Made When Submitting a PMN

- *Emerging Areas of Concern*

- Nanotechnology

- <http://www.epa.gov/oppt/nano/>
 - <http://www.epa.gov/osa/pdfs/nanotech/epa-nanotechnology-whitepaper-0207.pdf>
 - <http://www.fda.gov/nanotechnology/>



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Typical Submission Errors

- *Addressed in detail – EPA presentation at 2007GlobalChem*
 - http://www.socma.com/assets/File/socma1/PDFfiles/gcrc/2007/presentations/TSCA_Fundamentals_EPA.pdf



Common Errors Made When Submitting a PMN

- *Administrative – result in recycle*
- *Chemistry – result in recycle*
 - Chemistry Assistance Manual
 - Strongly recommend CAS-IES
- *Manufacturing and Use Process – can result in restrictions*

