



**Docket ID Number: EPA-HQ-OPPT-2016-0742**

**Comments to the U.S. Environmental Protection Agency (EPA) on the Scope of its Risk Evaluation for the TSCA Work Plan Chemical Methylene Chloride (CAS Reg. No. 75-09-2)**

Submitted on March 15, 2017 by  
Safer Chemicals, Healthy Families

The June 2016 amendments to the Toxic Substances Control Act require EPA to begin evaluating existing chemicals in commerce to determine whether they pose an unreasonable risk to human health and the environment. Methylene chloride was one of the first 10 chemicals selected for evaluation. On December 12, 2016, EPA posted a notice on Regulations.gov requesting information “including uses, products containing these chemicals, [and] exposed populations . . .”<sup>1</sup>

Safer Chemicals, Healthy Families has compiled the list below to provide EPA with information regarding uses and consumer products containing methylene chloride that are sold on retail websites. These products represent a source of potential exposure to consumers who purchase them, as well as to commercial workers and occupational bystanders as a result of the manufacturing process.

**List of Consumer Products Containing Methylene Chloride**

**Introduction.** Below is a list of products sold on retail websites, and thus available for purchase by consumers, described as containing methylene chloride in a product description or in Safety Data Sheets (SDSs). Note that this list does not include paint and coating removers, since EPA has already proposed a rule to address the unreasonable risks to human health presented by that use of methylene chloride.

**Methodology.** To find these products, Safer Chemicals, Healthy Families staff browsed Amazon.com for references to “methylene chloride.” We also searched on Google for MSDSs referring to “75-09-2,” including key words for relevant product types, and then confirmed the products described in the MSDSs were sold on major retailer websites such as [www.amazon.com](http://www.amazon.com).

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<sup>1</sup> Environmental Protection Agency Posting Memo on Regulations.gov in Docket ID EPA-HQ-OPPT-2016-0742-0001, December 12, 2016, <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2016-0742-0001>.

An asterisk means the item is included in the lists in EPA's February 2017 document entitled "Preliminary Information on Manufacturing, Processing, Distribution, Use, and Disposal" for methylene chloride.

**Notes.** The product descriptions quoted below are from the seller's website, unless otherwise noted. Safer Chemicals, Healthy Families has not independently verified the accuracy of the product descriptions.

## Adhesives

### ➤ *Craftics #33 Thick Acrylic Cement*



Product Description:

"... the best adhesive you can use for assembling our multi-part acrylic markers. . . Bonds acrylics, Rigid PVC, styrene, butyrate, and polycarbonate to themselves and each other"

*"Manufacturer recommended age: 7 years and up"* (emphasis added)

Sold At: <https://www.amazon.com/Craftics-33-Thick-Acrylic-Cement/dp/B00M1UB6BY>

Contains 30-60% methylene chloride by weight, according to the SDS available here: <http://www.litko.net/products/Craftics-%2333-Thick-Acrylic-Cement.html#.WLzDljevys2w>

### ➤ *"Sta'-Put" Multi-Purpose Spray Adhesive (SPM)\**



Product Description:

"... works well on plastic laminate, mirrors, tiles and other applications where strong, heat resistant bonds are needed."

Sold At: <https://www.amazon.com/Products-001-SPM16ACC-Sta-Put-Multi-Purpose-Adhesive/dp/B002SSDBEY>

Contains 45-70% methylene chloride by weight, according to the likely SDS for "SPM" available here:

<http://itwstaput.com/products/flammable-contact-adhesives/spm/>

## Automotive Care

➤ *A/C Pro Professional Refrigerant Formula (ACP-100CA)*



Product Overview from [The Home Depot website](#): "... the easiest to use A/C recharge product on the market. Our complete automotive recharge solution can easily restore the cold in less than 10 minutes." [MSDS](#): "For *consumer* and professional use" (emphasis added)

Sold At: <https://www.amazon.com/ACP-100CA-Professional-Formula-Solution-Refrigerant/dp/B007USCMD8>

Contains <1% methylene chloride, according to the SDS: <http://www.homedepot.com/catalog/pdfimages/7b/7b78dd3b-e5f1-4775-a507-5201e10027ab.pdf>

## Novelty

➤ *The Famous Lucky Drinking Bird\**



Product Description:

This classic novelty is a small, cleverly designed scientific wonder, using the properties of thermodynamics to keep it in constant bobbing motion. . . CAUTION: Please note this product is not a toy and is not intended for use by children under age of 8. The glass tube contains methylene chloride. . ."

Sold At: <https://www.amazon.com/Famous-Lucky-Drinking-Bird-Magic/dp/B00L9ICV8Q>

Contains methylene chloride, according to Product Description.