

Comments of the
Semiconductor Industry Association (SIA)
On
n-Methylpyrrolidone (NMP) Draft Revision to TSCA Risk Determination

87 Fed. Reg. 39511 (July 1, 2022)

[EPA–HQ–OPPT–2016–0743; FRL–9943–01– OCSP]

July 29, 2022

The Semiconductor Industry Association (SIA)¹ is pleased to submit these comments on the draft revision to the TSCA risk determination for n-Methylpyrrolidone (NMP). 87 Fed. Reg. 39511 (July 1, 2022).

SIA has provided information to EPA throughout its scoping and risk evaluation process for the conditions of use of NMP. Among other things, SIA has provided data and other information on its uses of NMP, the conditions of such use, and measures employed to mitigate potential exposures to semiconductor manufacturing workers. The information SIA provided to EPA is listed in Attachment A, and we request this information be included in the docket for the NMP risk determination.

EPA concluded in the final risk evaluation that certain conditions of use of NMP in the semiconductor industry present an “unreasonable risk” to semiconductor workers. SIA disagrees with this conclusion. The voluminous information SIA provided to EPA – which EPA deemed to be of “high quality” – supports the conclusion that the conditions of use of NMP in semiconductor fabrication in the U.S. safely mitigate worker exposure and present no unreasonable risks to workers. Accordingly, SIA has submitted a Request for Correction to the Agency’s Risk Evaluation.² As of this writing, the Agency has not responded to the Request, and the issues identified in SIA’s Request have not addressed or corrected in EPA’s revised Risk Determinations.

SIA requests EPA review and reconsider the extensive information and data SIA has previously submitted to the docket and as summarized in Attachment A as part of its process of finalizing the Risk Determination for NMP. Based on this information, EPA should conclude that existing management practices within the semiconductor industry with regard to NMP are sufficient to mitigate worker exposure to NMP in semiconductor manufacturing operations and to require no additional regulatory measures in a TSCA Section 6 rulemaking to address potential workplace exposures in the semiconductor industry.

¹ The Semiconductor Industry Association (SIA) is the voice of the semiconductor industry, one of America’s top export industries and a key driver of America’s economic strength, national security, and global competitiveness. Semiconductors – the tiny chips that enable modern technologies – power incredible products and services that have transformed our lives and our economy. Additional information is available at www.semiconductors.org.

² <https://www.epa.gov/quality/epa-information-quality-guidelines-requests-correction-and-requests-reconsideration#21004>.

Attachment A

SIA Submissions to EPA on NMP Risk Evaluation

Date	Submittal Type	Topic	Submitter	Hyperlink
3-Jun-2021	Request for Correction	Request for Correction by the Semiconductor Industry Association (SIA) On the Toxic Substances Control Act (TSCA) Risk Evaluation for N-Methylpyrrolidone (NMP), 85 Fed. Reg. 86558 (Dec. 30, 2020) [EPA-HQ-OPPT-2019-0236; FRL-10017-18]	SIA	https://www.epa.gov/quality/rfc-21004-n-methylpyrrolidone-nmp
3-Jun-2021	Report	Review of TSCA Section 6 Risk Evaluation of the Conditions of Use of NMP in the Semiconductor Industry prepared by Cardno Chemrisk, May 24, 2021	SIA	https://www.epa.gov/quality/rfc-21004-n-methylpyrrolidone-nmp
23-Feb-2021	Meeting	SIA-EPA Meeting on n-Methylpyrrolidone (2-Pyrrolidinone, 1-Methyl-) (NMP), EPA-HQ-OPPT-2019-0236	SIA	https://www.regulations.gov/document/EPA-HQ-OPPT-2020-0744-0003
12-Mar-2020	Meeting	Informal discussion with EPA (bulleted list submitted)	SIA	https://www.regulations.gov/document/EPA-HQ-OPPT-2016-0743-0115
21-Jan-2020	Comments	Comments of the Semiconductor Industry Association (SIA) On the Draft Toxic Substances Control Act (TSCA) Risk Evaluation for N-Methylpyrrolidone (NMP); 84 Fed. Reg. 60,087 (Nov. 7, 2019); [EPA-HQ-OPPT-2019-0236; FRL-10001-87]	SIA	https://www.regulations.gov/document?D=EPA-HQ-OPPT-2019-0236-0052
21-Jan-2020	Comments	Comments of Intel To the United States Environmental Protection Agency On the Draft Toxic Substances Control Act (TSCA) Risk Evaluation for N-	Intel	https://www.regulations.gov/document?D=EPA-HQ-OPPT-2019-0236-0064

		Methylpyrrolidone (NMP); 84 Fed. Reg. 60,087 (Nov. 7, 2019) [EPA-HQ-OPPT-2019-0236; FRL-10001-87]		
26-Nov-2019	SACC Comments	Semiconductor Industry Association, Nov. 2019. Comments of the Semiconductor Industry Association (SIA) To the Science Advisory Committee on Chemicals (SACC) On the Draft Toxic Substances Control Act (TSCA) Risk Evaluation for N-Methylpyrrolidone (NMP), 84 Fed. Reg. 60,087 (Nov. 7, 2019) [EPA-HQ-OPPT-2019-0236; FRL-10001-87]	SIA	https://www.regulations.gov/comment/EPA-HQ-OPPT-2019-0236-0031
5-Dec-2019	SACC Comments	Intel Comments to: Science Advisory Committee on Chemicals (SACC) On the Draft Toxic Substances Control Act (TSCA) Risk Evaluation for N-Methylpyrrolidone (NMP)	Intel	https://www.regulations.gov/document?D=EPA-HQ-OPPT-2019-0236-0037
7-Nov-2019	Comments	Comments of Intel To the United States Environmental Protection Agency On the Draft Toxic Substances Control Act (TSCA) Risk Evaluation for N-Methylpyrrolidone (NMP); 84 Fed. Reg. 60,087 (Nov. 7, 2019) [EPA-HQ-OPPT-2019-0236; FRL-10001-87]	Intel	https://www.regulations.gov/document?D=EPA-HQ-OPPT-2019-0236-0064
22-Feb-2019	Report	N-Methylpyrrolidone Risk Management Measures and Worker Exposure Monitoring Results	SIA	NOTE: This study was determined to be of high quality by EPA assessors.
16-Jul-2018	Comments	SIA Comments on Problem Formulation of the Risk Evaluation for N-Methylpyrrolidone (2-	SIA	https://www.regulations.gov/comment/EPA-HQ-OPPT-2016-0743-0100

		Pyrrolidinone, 1-Methyl-) CASRN: 872-50-4, EPA-HQ-OPPT-2016-0743		
11-Apr-2018	Meeting	SIA Meeting with EPA: NMP Worker Exposure and Controls in the Semiconductor Industry	SIA	
8-Nov-2017	Meeting	SIA Meeting with EPA on NMP use in the semiconductor industry	SIA	-
18-Sep-2017	Comments	SIA Comments To the EPA Docket on Methylene Chloride and N-Methylpyrrolidone (NMP), EPA Docket # EPA-HQ-OPPT-2016-0743	SIA	https://www.regulations.gov/comment/EPA-HQ-OPPT-2016-0743-0063
19-May-2017	Comments	SIA Comments on EPA Proposal on Methylene Chloride and N-Methylpyrrolidone; Regulation of Certain Uses Under TSCA Section 6(a) 82 Fed. Reg. 7464 (Jan. 19, 2017), EPA Docket # EPA-HQ-OPPT-2016-0231	SIA	https://www.regulations.gov/comment/EPA-HQ-OPPT-2016-0231-0593
15-Mar-2017	Comments	SIA Comments On the Preliminary Information on Manufacturing, Processing, Distribution, Use, and Disposal: N-Methylpyrrolidone (NMP), EPA-HQ-OPPT-2016-0743	SIA	https://www.regulations.gov/comment/EPA-HQ-OPPT-2016-0743-0019