

September 2, 2015

Gina McCarthy, Administrator (Mail Code 1101A)
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: NRDC/NEWMOA TSCA Petition for Rulemaking

Dear Administrator McCarthy,

The 22 undersigned organizations work to address public health and environmental concerns of communities across the United States. We are very concerned with the impacts of mercury pollution on human health, wildlife and the environment.

We are writing to you today to support the petition filed by the Natural Resources Defense Council (NRDC) and the Northeast Waste Management Officials' Association (NEWMOA) on June 24, 2015 to issue a rule requiring companies which import, produce, or use mercury (or mercury compounds) in manufacturing processes to provide data regarding these activities. A national mercury inventory was promised by EPA nearly a decade ago and these data are necessary to fulfill that promise.

Despite the fact that mercury is a powerful neurotoxin linked to significant environmental and public health damage, the US is in the dark about how much is used or imported in the country and by what industries. While NEWMOA compiles data in the Interstate Mercury Education and Reduction Clearinghouse (IMERC), this database is lacking information on mercury production or imports as well as on mercury compounds manufactured or imported for use in industrial processes. Furthermore, the largest product category of mercury use in products as of 2010 was switches and relays, and IMERC no longer includes current data on this product category because all of the states that require reporting to IMERC of mercury product sales have ended sale of mercury switches and relays. IMERC's data is also incomplete due to underreporting and non-reporting.

The petition seeks a rule under the Toxic Substances Control Act which will fill these gaps and produce missing data on product categories, such as children's products. It will build on data now collected by the State of Washington. The rule would provide the US government with the data needed to meet its obligations under the Minamata Convention to phase-down mercury use in multiple categories and discourage new uses of mercury.

For too long, mercury use data collection has been left to states. It is time that this activity be coordinated by EPA, building on and complimenting current IMERC data collection for maximum efficiency and effectiveness.

We urge EPA to grant the petition.

Sincerely,

Pamela Miller, Executive Director
Alaska Community Action on Toxics
Anchorage, AK

Bill Magavern, Policy Director
Coalition for Clean Air
Sacramento & Los Angeles, CA

Ronald White, Director of Regulatory Policy
Center for Effective Government
Washington, DC

Mike Belliveau, Executive Director
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Portland, Maine

Daniel Parshley, Project Manager
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Arlene Blum, Executive Director
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Eric Uram
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Rachel L. Gibson, JD, MPP, Director, Safer
Chemicals
Health Care Without Harm
US and Canada

Bill Walsh, Executive Director
Healthy Building Network
Washington, DC

Deanna White & Kathleen Schuler, Co-
Directors
Healthy Legacy Coalition
Minneapolis, MN

Dr. Olga Speranskaya and Manny Calonzo,
Co-Chairs
IPEN
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Michael Bender, Director
Mercury Policy Project
Montpelier, VT

Pete Didisheim, Senior Director of Advocacy
Natural Resources Council of Maine
Augusta, ME

Niaz Dorry, Coordinating Director
Northwest Atlantic Marine Alliance
Gloucester, MA

Melanie Houston, Director of Environmental
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Ohio Environmental Council
Columbus, OH

Chris Hagerbaumer, Deputy Director
Oregon Environmental Council
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Sejal Choksi-Chugh, Executive Director &
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San Francisco Baykeeper
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Robin Schneider, Executive Director
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