



June 24, 2020

David Williams
Chair, Toxics Use Reduction Institute's Science Advisory Board
The Offices at Boott Mills West
126 John Street, Suite 14
Lowell, MA 01852

RE: Petition to amend the Toxic or Hazardous Substance List by adding Single-Walled Carbon Nano-Tubes, Multi-Walled Carbon Nanotubes, Carbon Nanofibers

Dear Mr. Williams,

Public Employees for Environmental Responsibility (hereinafter "PEER") respectfully submits this joint petition to the Toxics Use Reduction Science Advisory Board (hereinafter "Board") to consider recommending that the Administrative Council on Toxics Use Reduction (hereinafter "Council") amend the Toxic or Hazardous Substance List by adding single-walled carbon nano-tubes, multi-walled carbon nanotubes, and carbon nanofibers (collectively, "carbon nano-particles"), and to lower the reporting threshold to 100g for these carbon nano-particles. PEER believes that these carbon nano-particles should be defined by basic physicochemical properties as there are hundreds of chemical abstract numbers (CAS) for these substances. Therefore, these carbon nano-particles should be categorized as a group.

As you are aware, 301 CMR 41.04 mandates that the Council consider recommendations from the Board. PEER is well aware that carbon nano-particles have a wide range of potential applications in medicine, electronics, construction, and consumer products. However, there are dozens of facilities in Massachusetts either producing or using these materials, and the market is growing. Given that there is evidence that these carbon nano-particles result in pulmonary toxicity and carcinogenicity, we believe that it is critical that the Board review the research and actions of other authoritative bodies taken in regard to these substances, and consider adding them to the Toxic or Hazardous Substance List. Justification for this petition is attached.

Thank you for consideration of the petition. Please do not hesitate to contact me with any questions.

Sincerely,

Kyla Bennett

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