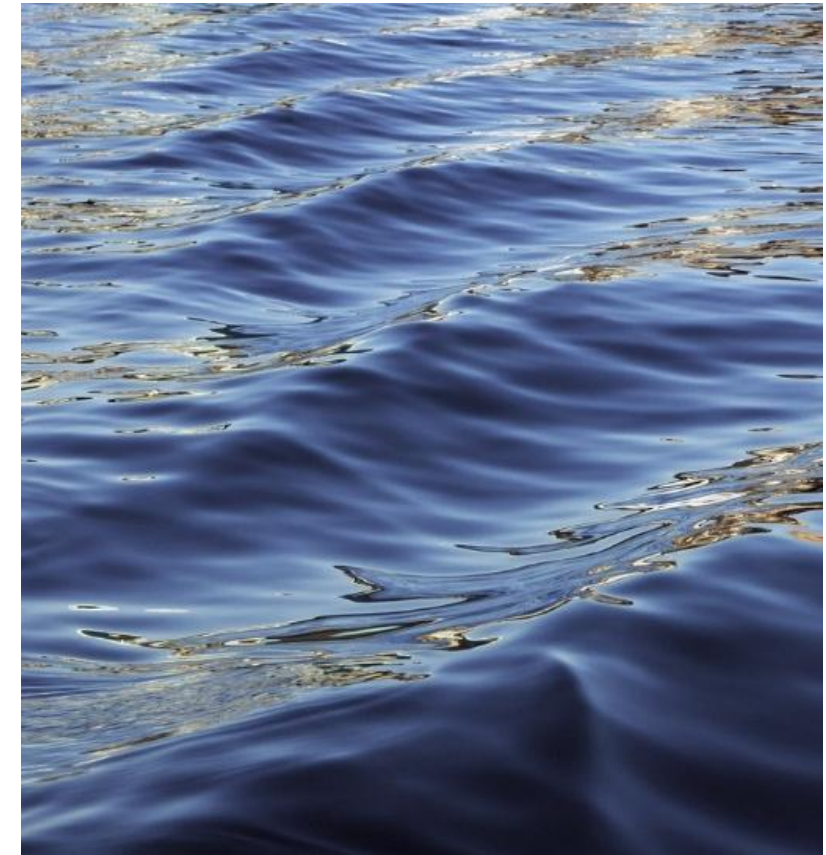
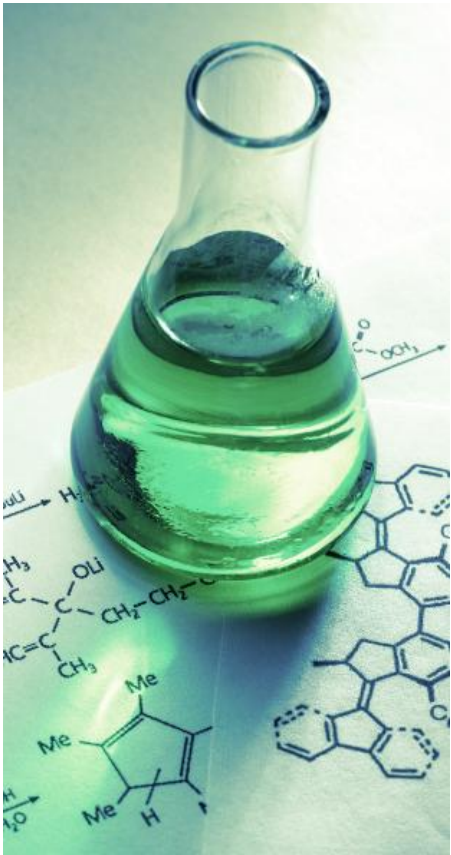


Toxics Substances Control Act (TSCA) Existing Chemicals Update

April 8th, 2026

TUR Conference, Session D

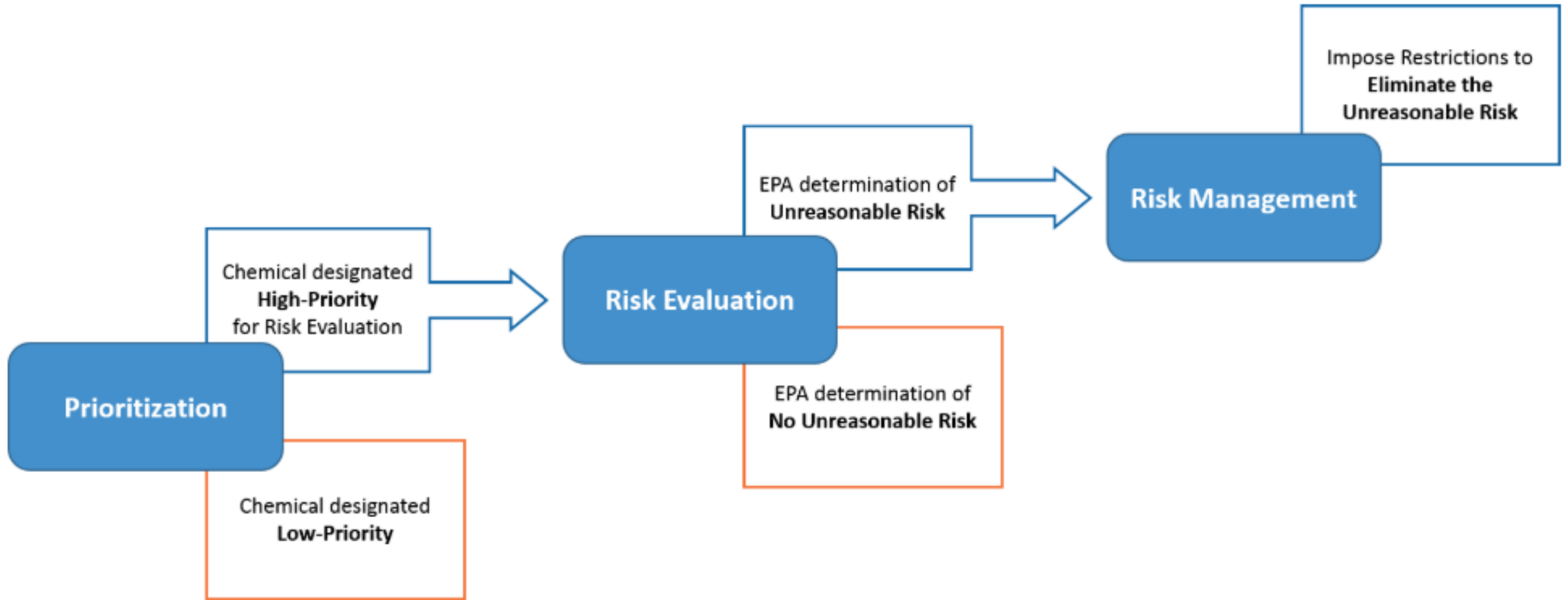


Overview

- Existing Chemical Risk Management Rule Updates (MeCl, TCE, PCE, nPB)
- Upcoming Existing Chemical Actions 2026/2027
- Potential Changes to TSCA



TSCA Existing Chemicals Process



Process for Risk Evaluation and Risk Management of Chemicals under TSCA – EPA Webpage

TSCA Risk Management Rule: Methylene Chloride (2024)

- All consumer uses already prohibited as of May 2025
- Most industrial uses to be prohibited on **April 28th, 2026**
 - i.e. Degreasing, Paints and Coatings, Paint and Coating Removers, Insulation
- Some industrial uses allowed with workplace chemical protection program (WCCP)
 - i.e. Laboratory Chemical, Bonding agent for solvent welding, plastic manufacturing
- Extended phase outs for furniture refinishers and use in adhesives/sealants for aircraft, space vehicles and turbines
- Laboratory WCCP delayed until 2026/2027
- Fifth circuit heard oral arguments in June 2025
 - Concerns regarding scope, PPE assumptions in risk evaluation

[EPA Compliance Guide -
MeCl Risk Management
Rule](#)

TSCA Risk Management Rule: Trichloroethylene (2024)

- All consumer uses and many industrial uses already prohibited
 - E.g. vapor degreasing in September, 2025
- Other industrial uses to be phased out over next few years while subject to WCCP
 - Energized Electrical Cleaner (December,2027), Lithium Battery Separators (December,2029)
- TSCA 6g exemptions are included with longer phase out timelines also subject to WCCP
 - Rocket Engine Cleaning (2031), Batch Vapor Degreasing for Essential Aerospace Parts and Medical Devices (2031), Essential Lab Activities (2074)
- Entry into force of 6g exemption workplace requirements have been delayed several times – currently until May 18th, 2026
- Litigation ongoing in 3rd circuit court

[EPA Compliance Guide - TCE Risk Management Rule](#)

TSCA Risk Management Rule: Perchloroethylene (2024)

- Upcoming prohibitions on manufacturing (June 2026) and processing of PCE (September 2026)
- March 2027 - All distribution of PCE prohibited and retailers prohibited from selling all PCE containing products
- Use in dry cleaning provided with specific phase out timeline (2025 – 2034)
- Some industrial uses permitted to continue under WCCP
 - Solvent-based adhesives, as a processing aid, batch vapor degreasing
 - Energized electrical cleaning subject to prescriptive controls
- In March 2026 EPA proposed extending WCCP compliance dates to June 2027
 - Intends to focus resources on enforcement of new compliance dates while extension is under review
- EPA announced intent to amend rule in summer of 2026 with finalization in 2027

TSCA Risk Management Rule: n-Propyl Bromide (2024)

- Proposed rule issued in August 2024
- Prohibits all consumer uses (except insulation) within 15 months of finalization
- Prohibits many industrial uses within 18 months of finalization
 - i.e. Dry cleaning, adhesives and sealants, automotive care
- Other industrial uses allowed under WCCP
 - e.g. Vapor and Aerosol Degreasing

[EPA Webpage - 1BP Risk Management Rule](#)

2026/2027 Upcoming Actions: TSCA Existing Chemicals

- Publish final risk evaluations for nPB and nMP by April 2026
- Potentially update Formaldehyde risk evaluation
- Continue finalization of risk evaluations for “Next 20 Chemicals”
 - 1,3-Butadiene, DIDP, DEHP etc. earlier in 2026
 - 1,2-DCE by April 30th, 2026
 - All remaining (i.e. TransDCE, Dichlorobenzene, Ethylene Dibromide) by February 2027
- Finalize risk evaluation scope documents for 5 substances
 - Vinyl chloride completed
 - Acetaldehyde, Acrylonitrile, Aniline, MBOCA due in 2026

[National Law Review Article - TSCA Forecast](#)

[Bergeson and Campbell Report - Chemical Regulatory Landscape 2026](#)

Potential Changes to TSCA in 2026/2027

- TSCA Amendment
 - House and Senate Discussion Drafts introduced earlier in 2026
 - Addresses definitions (conditions of use, unreasonable risk), existing chemicals, new chemicals and more
 - Two committee hearings on the draft, general industry support for action on TSCA while advocates against making statutory changes
- TSCA Risk Evaluation Framework Rule expected in 2026
 - EPA no longer required to consider all conditions of use,
 - Determination of risk to be made for each COU rather than entire chemicals
 - Risk evaluation will be made with assumption that proper PPE use
 - Pre-emption implications for States

[National Law Review Article - TSCA Forecast](#)

[Bergeson and Campbell Report - Chemical Regulatory Landscape 2026](#)



TURI

TOXICS USE REDUCTION INSTITUTE

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Thank you!

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