# Potential Topics for Reassessment of Use Reauthorizations

(in no particular order)

1. Framework for original TSCA Risk Assessment and selection of 50 ppm limit
   1. 50 ppm as nominal “use” and “reuse” limit: reason for original selection based on waste disposal capacity.
   2. Includes marking which allows : PCB < 50 ppm to be “non-PCB” in enclosed uses (nomenclature?)
   3. Broadening the definition of prohibition to < 50 ppm
   4. Removal of equipment from service
2. Definition of Excluded manufacturing Proces
3. Assumption of “quantifiable level” as 1 ppm
4. Economic evaluation, risk assessment, and cost burden of regulation assumptions
   1. Health, environmental, social impacts that can be expected from adoption of alternatives
   2. Consideration of life cycle costs and economic externalities
5. Use authorizations for PCBs (adhesives, caulk, coatings, etc. and 50 ppm limit)
6. Definition of “totally enclosed”
7. Question about status of PCB -11 evaluation by EPA
8. Certain PCB uses that pose an “unreasonable risk” and relationship with National Toxics Rule/Water Quality Standard
9. Disposal/clean up costs
   1. Impact for water treatment plants
   2. Economics for waste management
   3. Burden of cost disposal for community
10. Alignment of hazard assessment methodologies between programs
11. Recommend EPA support for green chemistry and pigment alternatives
12. WQ listings in US and success of TMDLS with respect to managing PCBs: control plan principles emphasize controlling at source
13. Relationship of the PCB limits with FDA/USDA limits and impact to environment (fish feed)
14. Environmental Justice and impact of PCBs on sustenance populations
15. Processes that lead to PCBs being recycled in products.
16. Impact of PCB spills to sensitive environments (fish).
17. Use of contaminated porous surfaces evaluation and pathways to the environment