

# Alkylphenols & Ethoxylates Research Council

1250 CONNECTICUT AVENUE, NW, SUITE 700, WASHINGTON, DC 20036  
(202) 419-1500 WWW.APERC.ORG INFO@APERC.ORG

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## **EPA Significant New Use Rule (SNUR) for Nonylphenol and Nonylphenol Ethoxylates Incorrectly Identifies Active Products as Inactive**

EPA's recent [Proposed Rule](#) to apply a Significant New Use Rule (SNUR) to nonylphenol (NP) and nonylphenol ethoxylates (NPEs) was intended to identify commercially inactive Chemical Abstract System (CAS) numbers for these compounds; however it incorrectly lists commercially active products as inactive. The Proposed SNUR is not intended as a ban or restriction on existing uses of commercially relevant NP or NPE compounds. Rather, the SNUR is intended to require notification to EPA of any new (or resumed) uses of inactive NP and NPE CAS numbers in order to provide the Agency with the opportunity to evaluate the new uses for any unreasonable risks. It also identifies those uses of commercially relevant NP CAS numbers that are known to the Agency and proposes a SNUR only on any new uses of this compound. The Alkylphenols & Ethoxylates Research Council will be providing comments to correct the record on these compounds and their uses.

There has also been some miscommunication about the relevance of this SNUR to the use of NPE in laundry and cleaning applications. This is likely because EPA's 2010 Chemical Action Plan for NP/NPEs proposed to issue a SNUR specifically for the use of NPEs in laundry. The recent Proposed SNUR is not specifically applicable to the existing use of NPEs in laundry and cleaning applications.

The Proposed SNUR is based on concerns about the aquatic toxicity of NP and NPE. It points out that EPA has finalized ambient Water Quality Criteria for NP, which are listed in the SNUR, apparently in error, as "6.6 µg/L for acute exposures and 1.7 µg/L for chronic exposures". The actual [EPA WQC](#) for NP are 28µg/L (acute) and 6.6 µg/L (chronic) for freshwater and 7.0 µg/L (acute) and 1.7 µg/L (chronic) for salt water. It is interesting to note that with the exception of data drawn from a study published more than 30 years ago, the monitoring data cited in the proposed SNUR document do not exceed these WQC. This provides confidence that current and existing uses of NP and NPE do not represent a risk to fish and aquatic species in U.S. surface waters.

Contact:  
Barbara S. Losey  
Deputy Director  
Alkylphenols & Ethoxylates Research Council  
1250 Connecticut Ave., N.W., Suite 700  
Washington, D.C., 20036  
[blosey@regnet.com](mailto:blosey@regnet.com)  
(202) 419-1500

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*The Alkylphenols & Ethoxylates Research Council has been in existence for over 25 years and is composed of manufacturers, processors and raw material suppliers of alkylphenols and alkylphenol ethoxylates, including NP and NPE. Its mission is to promote the safe use of AP and AP derivatives through research, product stewardship and outreach efforts, within the framework of responsible chemical management. The Research Council has sponsored over four million dollars in research and reviewed over four thousand studies on these compounds.*