

Alkylphenols & Ethoxylates Research Council

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Need for NPE Alternatives Assessment in Question: EPA DfE Criteria for Safer Surfactants Will Not Protect Workers, Consumers or the Environment

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Washington, D.C. - The Alkylphenols & Ethoxylates Research Council (APERC) questions both the need and basis for the EPA Design for Environment (DfE) Alternatives Assessment for Nonylphenol Ethoxylate (NPE) surfactants released yesterday, especially considering that NPEs have not been shown to present a risk to human health or the environment in the U.S.

The Alternatives Assessment is a component of EPA's action plan for NPE, which APERC has previously stated is seriously lacking in scientific rigor. In APERC's view, EPA's characterization of NPEs, and their environmental degradation intermediate nonylphenol (NP), as "compounds of concern" in the action plan is not justified. APERC also believes the action plan document for NP/NPE is not scientifically robust and does not reflect the weight the extensive data available for these compounds.

While both the Alternatives Assessment and the NP/NPE action plan acknowledge U.S. EPA's Water Quality Criteria (WQC) for NP (concentrations in surface water that are protective of fish and other aquatic species), neither considers monitoring data that show that concentrations in U.S. waters do not represent a risk relative to those WQC.

APERC believes that the Alternatives Assessment for NPEs represents at best a simplistic hazard-based review that will not ensure that products formulated with the alternative surfactants will be safer or pose a lesser risk to human health or the environment. It does not sufficiently address the ecotoxicity or the human safety of the alternative surfactants and other co-ingredients that are commonly used in alternative formulations that attempt to match the performance of NPEs. It is APERC's view that promoting alternative surfactants based solely on acute aquatic toxicity and biodegradation potential of the parent surfactants may result in the promotion of products that have limited health and environmental effects data while promoting market deselection of NPEs, which have

been extensively-studied, subject to comprehensive risk assessments and shown not to pose a risk to human health or the environment when used as intended.

Of particular concern is the fact that DfE has not required adequate assessment of the environmental impact of the alternative surfactants and avoids evaluating the chronic toxicity of the environmental degradants formed from the alternatives because they are not “persistent”. Surfactants used in cleaning and laundry products are continuously discharged down-the-drain to wastewater treatment plants where they are degraded before discharge to the environment. Regardless of biodegradation profile, environmental exposure to the degradants will be continuous; therefore EPA should require chronic toxicity assessments for the degradants of all the alternative surfactants. EPA’s response to comments submitted on this point is based on the assumption that “alternatives will degrade before and during wastewater treatment and thus never enter an aquatic environment”; however treatability studies or monitoring data to support this assumption are not provided.

DfE also does not address the toxicity and human safety of the alternatives and other co-ingredients. Since cleaning and laundry products are used daily by consumers and workers the human safety of alternatives should be a basic consideration in the assessment of surfactants.

APERC recommends that DfE reconsider and enhance the criteria it has selected for “safer surfactants” to better ensure their safety to consumers, workers and the environment.

NPEs are cost-effective surfactants that provide high technical performance in a broad array of applications. The weight of the scientific evidence for NP and its ethoxylates continues to support their human and environmental safety when used as intended and disposed of responsibly.

The mission of the Alkylphenols & Ethoxylates Research Council, which is composed of manufacturers, processors and raw material suppliers of alkylphenols (AP) and alkylphenol derivatives (e.g., alkylphenol ethoxylates (APE)), is to promote the safe use of AP and AP derivatives through research and outreach within the framework of responsible chemical management. For more information about AP and APE go to www.aperc.org.