

February 13, 2023

Barry N. Breen
Acting Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OLEM-2022-0971

Dear Assistant Administrator Breen,

The Center for Biological Diversity and undersigned groups urge the Environmental Protection Agency (EPA) to classify discarded polyvinyl chloride (PVC) as hazardous waste under the Resource Conservation and Recovery Act (RCRA). For the reasons discussed below, the agency must, at a minimum, revise its solid waste management guidelines to reduce the significant threats to human health and the environment arising from the improper disposal of this plastic trash.

PVC is one of the most widely used forms of plastic, and about 7 billion pounds of PVC is discarded every year in the United States. PVC is found in children's toys, clothing, consumer packaging, building materials, electronics and many other household goods. Yet numerous studies have found it is highly toxic to human health and the environment. It releases toxic chemicals and carcinogens, including dioxin and phthalate plasticizers, into the air, water and food web at every stage of its life cycle. Among the human health risks associated with exposure to PVC and its additives are reproductive harm, hormone disruptions, abnormal brain and reproductive development, obesity, insulin resistance and damage to the liver and other organs.

Scientists, scholars and concerned citizens have long warned that inadequate waste management strategies are contributing to the widespread degradation of the marine environment. As much as eighty percent of ocean litter consists of lightweight and durable plastic trash, which poses a range of serious threats to marine organisms. Plastic consumption affects nearly half of existing seabird and cetacean species, all marine turtles and many ecologically and commercially important fish, shellfish, grasses and corals. If current rates of plastic introduction into the ocean continue, by 2050 approximately 99 percent of all seabird species will have ingested plastic.

Even before the production of this material began to accelerate in the 1930s, researchers suspected that PVC's primary building block, vinyl chloride, produced toxic effects in laboratory animals. In addition to vinyl chloride, PVC contains significant concentrations of regulated and unregulated chemical additives, including phthalate plasticizers and heat stabilizers mixed from lead, calcium, barium and cadmium. Recent studies reveal that finished PVC products leach significant concentrations of these compounds into the environment as they deteriorate with age,

threatening severe biological consequences. For example, one-quarter of U.S. women already exhibit concentrations of phthalate metabolites higher than those correlated with irregular sexual development in male infants, and scientific evidence indicates that contamination might be even more prevalent in urban settings.

Although EPA has now acknowledged PVC as a human carcinogen, and despite its status as one of the most hazardous consumer products ever created, PVC and its associated chemical additives are managed in much the same way as food scraps and grass clippings after disposal. Americans already discard billions of pounds of this plastic each year, and experts anticipate that annual waste generation will increase significantly in the near future, as durable products and construction goods reach the end of their useful lives. Plastic pollution accumulating in the oceans is predicted to outweigh all the fish in the sea by 2050.

Despite PVC's well documented harms to human health and marine ecosystems, policymakers have implemented few practical measures to address this problem. To preserve the marine environment and protect human health, we urge EPA to promptly exercise its authority to ensure the safe disposal of discarded PVC and the protective management of associated chemical substances, including vinyl chloride and phthalate plasticizers.

Sincerely,

Center for Biological Diversity

Plastic Pollution Coalition

Ecology Center

The Last Plastic Straw

Safer States

The Last Beach Cleanup

California Communities Against Toxics

Breathe Project

Turtle Island Restoration Network

FracTracker Alliance

Texas Campaign for the Environment

Micah Six Eight Mission

FreshWater Accountability Project

Inland Ocean Coalition

Moms Clean Air Force

Californians Against Waste

Ban SUP (Single Use Plastic)

Zero Waste Washington

Breathe Free Detroit

Friends of the Earth

Greenpeace USA

Texas Campaign for the Environment

Ban SUP

5 Gyres Institute

Buckeye Environmental Network

Center for Environmental Health

Zero Waste Ithaca