

Nonylphenol Ethoxylate (NPE) Substances

The EPA recently issued an Advance Notice of Proposed Rulemaking (ANPRM) regarding Nonylphenol Ethoxylate (NPE) substances. The ANPRM could require every commercial laundry facility to install air-monitoring equipment. After reviewing the ANPRM representatives of the Textile Rental Services Association of America (TRSA) met with officials at the EPA. The officials made it clear that they intended to ultimately promulgate a rule concerning NPE regardless of past industry initiatives to voluntarily eliminate NPE by 2015.

In 2008, TRSA joined EPA's Safer Detergents Stewardship Initiative (SDSI) and pledged to phase out potentially harmful surfactants, such as NPE in favor of safer surfactants.

1. The industry has traditionally relied on NPE as its primary surfactant.
2. TRSA committed to voluntarily eliminating NPE by 2015 (despite the absence of any reported health effects associated with exposure to NPE).
3. EPA recognized TRSA as an SDSI "Champion" due to this voluntary commitment.

The textile services industry has made great strides in their voluntary commitment.

1. Sales of NPE containing products have declined 10% in the last year, 50% over the last three years and 75% over the last five years.
2. Currently only 25% of detergent products contain NPE.

Based on the textile services industry voluntary commitment to eliminate NPE by 2015, EPA officials suggested that there might be a way to resolve this issue. They suggested that if the industry were to make the voluntary commitment a mandatory requirement they might view the whole issue as a moot point.

TRSA submitted comments to the EPA regarding NPE on September 15th. In lieu of pursuing unnecessary air monitoring and to demonstrate fully the industry's commitment to workplace safety and advancing the use of environmentally favorable washroom chemicals, the industry indicated it is willing to consider making mandatory the current voluntary commitment to eliminate NPE.

1. TRSA indicated it would be interested in working with the EPA to craft a mandatory phase-out agreement as soon as possible to commence January 1, 2016.
2. We await a response from the EPA to our comments.