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Alkylphenols & Ethoxylates Research Council Questions Need and Basis for U.S. EPA Program to Assess Alternatives for Nonylphenol Ethoxylate Surfactants

September 29, 2011

FOR IMMEDIATE RELEASE

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

APERC's initial reaction to the draft Alternatives Assessment for NPE, which the U.S. EPA Design for Environment (DfE) program released for public comment today, is that the activity is premature considering that U.S. EPA has not provided any basis to support concern about the safety of these surfactants.

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

While both the Alternatives Assessment and the NP/NPE action plan acknowledge U.S. EPA's finalized Water Quality Criteria (WQC) for NP (concentrations in surface water that are protective of fish and other aquatic species), neither considers whether concentrations in U.S. waters represent a risk relative to those WQC. In an extensive assessment of environmental monitoring studies in the U.S. by Klecka et al. (2007), the authors found that the probability that concentrations of NPE and its metabolites in US surface waters exceed the chronic NP WQC is low, even when considered in aggregate.

With regard to the Alternatives Assessment process for NPE, it is of great concern to the members of APERC that DfE has sidestepped its own process requirement to convene stakeholders in the development of the alternative criteria and assessment. Offering a draft assessment document does not offer the same opportunity for stakeholders to review and provide data that an open public stakeholder process would offer. Notwithstanding the voluntary nature of the DfE Alternatives Assessments Program, the product recommendations that arise from this program will ultimately influence the purchasing preferences in the market. Therefore it is APERC's view that the Agency should provide all members of the public with the opportunity to provide input on all aspects of the development of a specific alternative assessment, not just those parties most likely to benefit from the outcome.

Also of concern is that DfE has not required adequate assessment of the environmental impact of the alternative surfactants. The draft Alternatives Assessment avoids evaluating the chronic toxicity of the environmental degradants formed from alternative products 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.

DfE also does not address the toxicity of other co-ingredients that are commonly used in alternative formulations in attempt to match the performance of NPEs.

NPEs are cost-effective surfactants that provide high technical performance in a broad array of applications. The weight of the scientific evidence for nonylphenol and its ethoxylates continues to support their human and environmental safety when used as intended and disposed of responsibly. The DfE Alternatives Assessment for NPE was based on input from companies interested in obtaining U.S. EPA recognition of their alternative surfactants for use in cleaning and laundry products. Assumptions about the cost, efficacy and safety of the use of alternative surfactants in other applications are not necessarily comparable.

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.