



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 31 2015

Ms. Kathleen M. Roberts
BRAG Executive Director
2200 Pennsylvania Ave., NW, Suite 100W
Washington, DC 20037

Dear Ms. Roberts:

The U.S. Environmental Protection Agency has completed its review of your petition dated October 5, 2015 requesting the Agency to promulgate a rule pursuant to TSCA section 8 that would "establish a process to amend the list of natural sources of oil and fat in the 'Soap and Detergent Association' (SDA) nomenclature system by considering the chemical equivalency of additional natural sources."

Based on this review and careful consideration of your request, the EPA is denying the petition. The reasons for the EPA's denial are set forth in the enclosed, prepublication copy of a notice which will be published in the *Federal Register* in a few days announcing the EPA's decision. You have the right to appeal this denial by commencing a civil action in a U.S. district court to compel initiation of the requested rulemaking proceeding within 60 days of the date of this denial letter.

Note that TSCA section 5(h)(4) provides that "[t]he Administrator may, upon application and by rule, exempt the manufacture of any new chemical substance from all or part of the requirements of section 5 if the Administrator determines that the manufacture, processing, distribution in commerce, use, or disposal of such chemical substance, or that any combination of such activities, will not present an unreasonable risk of injury to human health or the environment." As such, this section of TSCA may be more relevant to the subject of your petition.

If you would like to discuss these matters further, please contact Wendy Cleland-Hamnett, Director of the Office of Pollution Prevention and Toxics, at 202-564-3810.

Sincerely,

A handwritten signature in black ink, appearing to read "James J. Jones".

James J. Jones
Assistant Administrator

Enclosure