



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

[Submitter name]
[Submitting Company]
[Address]

Re: [case number], [chemical name]

Dear [Submitter name],

EPA is initiating a Per- and Polyfluoroalkyl Substances (PFAS) Low Volume Exemption (LVE) Stewardship Program. This PFAS stewardship program builds upon a 2016 outreach effort that resulted in companies withdrawing more than half of the 82 long-chain PFAS LVEs that were targeted for withdrawal at the time. There are currently LVEs granted for more than 600 PFAS. For this 2021 expanded effort, EPA's goal is to encourage the voluntary withdrawal of these remaining PFAS LVEs.

Your company has been identified as having been previously granted a Low Volume Exemption (LVE) for the case and chemical identified above. As such, EPA invites you to participate in the [PFAS LVE Stewardship Program](#). If you wish to participate you should submit a voluntary withdrawal of your LVE. If you plan to continue manufacture of the LVE substance, you may wait to withdraw your LVE until you submit a premanufacture notice (PMN) and EPA issues a determination. EPA will provide recognition of your participation in the Stewardship Program at the time you withdraw your LVE.

The PMN review will give the Agency sufficient time to assess the PFAS in order to ensure that potential risks or data gaps are identified, and appropriate restrictions are in place to protect human health and the environment, as necessary. Additionally, the contemporary EPA risk assessment using the most up-to-date methods and knowledge will provide valuable market knowledge and could increase consumer confidence. This approach is consistent with the TSCA mandate for risk-based decision making for new chemicals before they are introduced into commerce.

The purpose of waiting to withdraw your LVE until after the PMN is reviewed is because after you withdraw your LVE and before EPA has made a determination on the PMN, the manufacture of a chemical substance that is not on the TSCA Inventory is not authorized by the statute or regulations. Therefore, depending on the PMN determination, you may be prevented from continuing to manufacture the PFAS.

If you did not claim your company name as Confidential Business Information (CBI), your company will be recognized by name on our website as a participant in the PFAS LVE Stewardship Program after you withdraw your LVE.

How to participate in the Stewardship Program and withdraw your LVE:

1. In [CDX](#), click on the "Primary Authorized Official" link for the "CSPP: Submissions for Chemical Safety and Pesticide Programs" data flow.

2. Select “TSCA Section 5 Notices and Supports – ePMN” from the CISS screen drop-down list and click “OK.”
3. Within the reporting application, click on the “Forms” link or tab and select the “Support” form type from the drop-down at the bottom of the screen, and click “Start New Form.” (For more specific directions or general questions relating to using CDX or creating a support document please see the User Guide in the “Resources” tab or one of the other virtual assistant functions available in CDX).
4. When the support document screen opens, enter the case number associated with the LVE in the “Case Number” field under “I. Original Notice Submissions Information” and then select “Withdrawal Request” from the dropdown under “IV. Type of Support.” After selecting the file type, follow the prompts to complete the submission.
5. Since this is a voluntary withdrawal, please do not check the box titled “Check if requested by EPA/Contractor.”
6. Click “Next” at the bottom of the page and follow the prompts to confirm your identity.

Assistance can also be found by contacting the CDX help desk at 888-890-1995 | (970) 494-5500 for International callers.

By withdrawing your LVE, you will be certifying that you will no longer manufacture and/or import the relevant chemical under this exemption. Withdrawal of your LVE does not prohibit you or your customers from continuing to process, distribute in commerce, or use *existing stocks* of the chemical substance. Consistent with the terms that were articulated in the LVE, after the LVE is withdrawn, any future processing/use of existing stocks remains subject to any use and exposure/release restrictions in the LVE notice under which those stocks were manufactured. Your company also remains subject to the customer notification requirements in 40 CFR 723.50(k) for those existing stocks. As to recordkeeping requirements, 40 CFR 723.50(n) requires you to maintain certain records for a period of 5 years after their preparation. This includes records documenting compliance with any applicable requirements or restrictions related to processing, distribution, or use of existing stocks.

As of now, there is no end date to the program. You may withdraw your PFAS LVE at any time, although EPA encourages participation as soon as practical for your company.

For questions regarding the Stewardship Program, or if you feel this invitation was sent in error, please contact PFASLVEstewardship@epa.gov and OPPT’s New Chemicals Division will respond to your questions. Please do not include any confidential business information in your email.