



October 13, 2016

MEMORANDUM

TO: AWPA Stainless Committee Members
AWPA Lubricant Suppliers

FROM: Janet Kopenhaver, AWPA Director of Government Relations

AWPA has previously reported to members about the EPA initiative to ban the use of chlorinated paraffins (CPs) contained in metalworking fluids, which are primarily used in the stainless wire manufacturing process. AWPA, along with several other associations, and the coalition of which AWPA is a member, submitted comments to EPA arguing against this effort. We are now awaiting EPA's review of the comments; a decision about the request for a peer review of the issues brought up in these comments; and a decision from EPA.

In the meantime, we have learned that some wire producers are experiencing confusion by their customers, who believe that these CPs have already been banned by EPA. The EPA has NOT banned the use and importation of Medium and Long-chain Chlorinated Paraffins. We have provided some information and materials you may use in discussion this issue with your customers:

- EPA cannot act unilaterally to remove these chemicals from the market without additional rulemaking and/or court action. Such actions will allow for interested parties, like CP users, to comment and be involved in the process.
- The coalition has made a very compelling case that the banning of these chemicals is a significant action that warrants peer-review of the underlying scientific data. No final decision can or should be made by EPA until a decision is made on peer review.
- Attached is an article summarizing the issue and expounding on the details, which you can also share with your customers.

AWPA has posted significant information on the AWPA website, with regard to this issue, on the [Environmental, Health & Safety page here](#).

Please don't hesitate to contact me if you have further questions:
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