April 16, 2020

Ms. Alexandra Dunn  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

ATTN: DOCKET NO. EPA-HQ-OPPT-2019-0500


Assistant Administrator Dunn:

We, the undersigned health organizations, request that EPA suspend the public comment period for the trichloroethylene (TCE) draft risk evaluation while President Trump’s national emergency declaration remains in effect, and provide at least 60 days for comment once the national emergency is lifted. It is essential that EPA afford all stakeholders adequate time and opportunity to be publicly heard.

On March 13, 2020, President Trump declared a national emergency in response to the ongoing global pandemic caused by the novel coronavirus. Every American has been affected by the unprecedented disruptions caused by the pandemic, tens of thousands are sick, and public health experts believe conditions will get worse before they get better.

Nationwide people are needing to adjust to a new reality that includes caring for and educating children in the home, working remotely or worrying about loss of income, and, for some, serving on the front lines providing health care and services – including those in communities hit hardest by TCE.

At the same time, many public health and scientific experts—whose input on the draft risk evaluation is essential—are working tirelessly to prevent the pandemic from claiming thousands more lives and to protect public health now and in the future. There is simply not capacity to focus on the draft TCE risk evaluation until the national emergency is over.

We, as both stakeholders on the front line of COVID-19 and as organizations in support of those who are, urge you to grant this extension of the public comment period during the ongoing crisis.

Sincerely,

American Academy of Pediatrics  
American College of Obstetricians and Gynecologists  
American Public Health Association

Children’s Environmental Health Network  
March of Dimes  
Mom’s Clean Air Force