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Submitted through <https://www.regulations.gov>

Mr. Todd Coleman  
Existing Chemicals Risk Management Division (7404M)  
Office of Pollution Prevention and Toxics,  
Environmental Protection Agency  
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RE: Di-isodecyl Phthalate (DIDP) and Di-isononyl Phthalate (DINP); Science Advisory Committee on Chemicals (SACC) Peer Review of Draft Documents; Notice of SACC Meeting; Availability; and Request for Comment, EPA-HQ-OPPT-2024-0073

Dear Mr. Coleman:

The Alliance for Automotive Innovation (Auto Innovators)<sup>1</sup> appreciates the opportunity to provide comments on EPA's draft risk evaluation for Di-isodecyl Phthalate (DIDP).<sup>2</sup> Auto Innovators represents the auto manufacturing sector, including automakers that produce and sell approximately 95% of the new light-duty vehicles in the United States. Our mission is to work with policymakers to realize a future of cleaner, safer, and smarter personal transportation and to work together on policies that further these goals, increase U.S. competitiveness, and ensure sustainable, well-paying jobs for citizens throughout the country.

The draft risk evaluation found that the only condition of use (COU) preliminarily presenting unreasonable risk of injury to human health of workers exposed to the chemical "was for a scenario in which unprotected workers were to spray adhesives and sealants that contain DIDP with high-pressure sprayers, because doing so could create high concentrations of DIDP in mist that an unprotected worker could inhale."<sup>3</sup> The draft risk evaluation also determined that DIDP does not pose unreasonable risk of injury to human health for consumers or the general population or pose unreasonable risk to the environment.<sup>4</sup>

Our comments address (1) the specific COU that EPA has identified as driving the unreasonable risk determination for DIDP; and (2) the workplace controls that are routinely in place in automotive facilities.

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<sup>1</sup> From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. Active in Washington, D.C. and all 50 states, the association is committed to a cleaner, safer, and smarter personal transportation future. [www.autosinnovate.org](http://www.autosinnovate.org).

<sup>2</sup> 89 Fed. Reg. 43,847 (May 20, 2024).

<sup>3</sup> Environmental Protection Agency, Draft Risk Evaluation for Diisodecyl Phthalate (DIDP) (May 2024), at 12, available at <https://www.epa.gov/system/files/documents/2024-05/didp--draft-risk-evaluation--public-release--hero--may-2024.pdf> (hereinafter Draft Risk Evaluation).

<sup>4</sup> Draft Risk Evaluation at 10.

## Use of DIDP in High-Pressure Spraying

EPA has initially determined that DIDP presents an unreasonable risk of injury to human health but notes that there is some uncertainty around whether the single COU of DIDP—the high-pressure spraying of it in the workplace—is currently conducted in facilities that use DIDP. The Agency expects that public comments on this draft will help address this uncertainty.<sup>5</sup>

While small amounts of DIDP may be present in adhesives and sealants that are applied to vehicles, to our knowledge high-pressure spraying is not employed as an application technique in our facilities. Two different tips reportedly may be used in machinery applying adhesives and sealants containing DIDP: a streaming tip with an orifice of either 1mm or 1.4mm, or an extruding tip with an orifice of either 2mm, 3mm, or 5mm. In both of these cases the material comes out as a solid stream of material. Neither of these options results in spraying at pressures of 30-60 psig, the pressure cited by EPA in its draft evaluation as “high-pressure.”<sup>6</sup> The sealant/adhesive material is thick and therefore often requires heating and comes out in beads and not a spray. A video from Toyota’s facility in Kentucky shows the painting process and the use of robots for paint and sealants; low-pressure application of sealant is shown at 8:15.<sup>7</sup>

In the infrequent case where a manual application may be needed,<sup>8</sup> exposures are mitigated through multiple means. The jobs are recirculated until automation is repaired, meaning that exposure to any one employee is minimized. The actual application also takes place in a ventilated booth; employees doing the manual operations wear safety glasses, a face shield, coveralls, gloves, and N95 masks.

## Workplace Controls for High-Pressure Spraying Operations

While DIDP is not applied using high-pressure spraying operations, when high-pressure spraying is required for any specific automotive application, the following controls are applied:

1. Automated Robotic Spray Systems: These systems reduce the risk of exposure by minimizing direct human interaction with the spraying process.
2. Enclosed Booths: The spraying takes place in enclosed booths. Enclosures help contain aerosols and fumes, preventing them from spreading to other areas.
3. Airflow Requirements: The booths are designed with airflow requirements of 1,500 to 3,500 CFM (Cubic Feet per Minute). This ensures sufficient ventilation to control and exhaust airborne contaminants.
4. Downdraft Systems: Many booths are equipped with downdraft systems. These systems help by pulling aerosolized particles downward and out of the environment, further reducing the risk of contamination to the surrounding area as well as reducing the risk of inhalation exposure.
5. Personal Protective Equipment (PPE):
  - NIOSH-Approved Powered Air Purifying Respirator (PAPR): Employees wear PAPRs that use a blower to force ambient air through air-purifying elements before delivering

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<sup>5</sup> Draft Risk Evaluation at 10.

<sup>6</sup> Draft Risk Evaluation at 158.

<sup>7</sup> *Toyota Kentucky 2012*, Youtube, [https://www.youtube.com/watch?v=8q\\_GEHIEluE](https://www.youtube.com/watch?v=8q_GEHIEluE).

<sup>8</sup> For example, a breakdown of automated equipment.

it to the employee's breathing zone. This protects against inhalation of airborne particles and fumes.

- Impermeable Body Protection Suits: These suits provide full-body protection against contact with paint and chemicals.
- Gloves and Rubber Boots: These protect the hands and feet from direct exposure to chemicals and ensure that no substances come into contact with the skin.

These measures collectively create a comprehensive safety protocol aimed at protecting employees from both inhalation and contact exposure hazards associated with high-pressure spraying operations. The combination of automated systems, controlled environments (enclosed booths with proper ventilation), and appropriate PPE ensures a high level of safety during these operations.

### Conclusion

In closing, Auto Innovators reiterates that our facilities do not use high-pressure spray applications of adhesives or sealants containing DIDP. We have also provided details of workplace controls when high-pressure spraying operations may be required for other substances.

We hope these comments provide clarity to EPA on the use of high-pressure spraying applications of adhesives and sealants containing DIDP. If Auto Innovators can be of further assistance, please feel free to contact me at 202-326-5511 or [cpalin@autosinnovate.org](mailto:cpalin@autosinnovate.org)

Sincerely,



Catherine Palin  
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Alliance for Automotive Innovation