

From the  
Chemical & Material Risk Management Program  
Office of the Under Secretary of War for Acquisition and Sustainment

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Department of War  
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

# Chemical & Material Emerging Risk Alert

## U.S. EPA Regulation of Existing Chemicals

*This risk alert was developed to provide U.S. Department of War (DoW) leadership, weapon system program offices, and the acquisition, sustainment, industrial base policy, and logistics communities an overview of the U.S. Environmental Protection Agency's (EPA's) authority to regulate existing chemicals under the Toxic Substances Control Act (TSCA) Section 6 and a list of chemicals in the pipeline for potential regulation, many of which have critical DoW uses.*

### How does EPA regulate chemicals under TSCA Section 6?

TSCA Section 6 requires the EPA to evaluate the health and environmental hazards of high priority existing chemicals. If an unreasonable risk to human health or the environment is identified, EPA is mandated to impose restrictions—such as phase-outs, workplace exposure limits, or bans on the manufacture, processing, distribution in commerce, use, or disposal of the chemical—to eliminate the unreasonable risk.<sup>1</sup>

### How does TSCA impact DoW use of chemicals and materials?

Equipment, weapon systems, and platforms provided to the warfighter are made from and depend on critical chemicals and materials. The mission critical chemicals and materials needed for system production, performance, and sustainment are essential to DoW operations and mission readiness. Critical chemicals are increasingly at risk for obsolescence due to market phase outs; manufacturer liability; complex geopolitical escalation dynamics; and regulatory complexity, uncertainty, and inconsistency which impact all levels of the chemical supply chain.

Restrictions and prohibitions promulgated by EPA under TSCA Section 6 may trigger market shifts, supply chain disruptions and the forced obsolescence of mission critical components. Proactive engagement between DoW and the EPA is essential to mitigate these impacts.

### How does DoW engage with EPA?

DoW shares chemical use and criticality information with the EPA throughout the risk evaluation and risk management processes to inform the rulemakings. Information sharing early in the process can support the development of exemptions to allow the continued use of critical chemicals. The implications of not identifying critical applications can result in the eventual restriction and/or prohibition of mission critical uses as well as increased supply chain risks. Figure 1 illustrates EPA's TSCA Section 6 process and DoW's engagement opportunities.

### What chemicals have undergone or are currently undergoing risk evaluations as part of TSCA?

The chemicals listed in Table 1 have either undergone or are currently undergoing risk evaluation under TSCA Section 6 to determine whether the chemical presents an unreasonable risk to public health or the environment.<sup>2</sup>

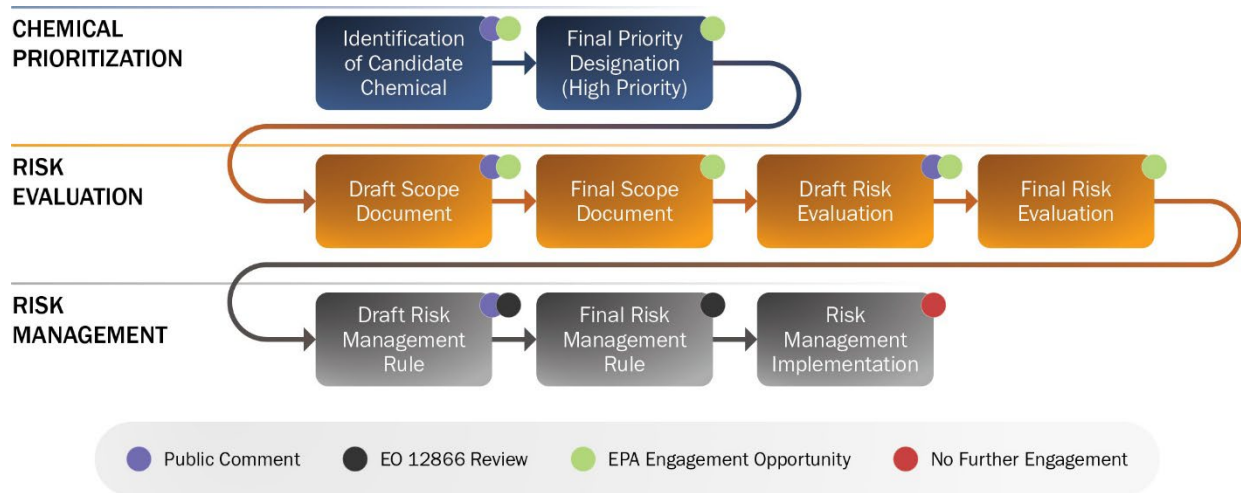
***If you are aware of any DoW uses or critical dependencies of any of these chemicals along your supply chain, please reach out to the Program mailbox at [osd.pentagon.ousd-atl.mbx.cmrmp@mail.mil](mailto:osd.pentagon.ousd-atl.mbx.cmrmp@mail.mil).***

Understanding uses of these chemicals within the DoW supply chain is vital to predict impacts on the availability and use of mission critical chemicals and materials by the Department and the industrial base, and the potential need for alternatives development.

<sup>1</sup> EPA. <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/how-epa-evaluates-safety-existing-chemicals> (accessed 23 May 2026).

<sup>2</sup> EPA. <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/ongoing-and-completed-chemical-risk-evaluations-under> (accessed 23 May 2026).





**Figure 1. EPA TSCA Section 6 Process**

**Table 1: Chemicals with Ongoing or Completed Risk Evaluations under TSCA Section 6**

Chemical Name	CASRN
1-Bromopropane (1-BP)	106-94-5
1,1-Dichloroethane	75-34-3
1,1,2-Trichloroethane	79-00-5
1,2-Dichloroethane	107-06-2
1,2-Dichloropropane	78-87-5
1,3-Butadiene	106-99-0
1,3,4,6,7,8-Hexahydro-4,6,6,7,8,8-hexa methylcyclopenta [g]-2-benzopyran (HHCb)	1222-05-5
1,4-Dioxane	123-91-1
4,4'-(1-Methylethylidene)bis[2, 6-dibromophenol] (TBBPA)	79-94-7
Acetaldehyde	75-07-0
Acrylonitrile	107-13-1
Asbestos	1332-21-4
Benzenamine	62-53-3
Butyl benzyl phthalate (BBP)	85-68-7
Carbon Tetrachloride (CTC)	56-23-5
C.I. Pigment Violet 29 (PV29)	81-33-4
Cyclic Aliphatic Bromide Cluster (HBCD)	25637-99-4; 3194-55-6; 3194-57-8
Di-ethylhexyl phthalate (DEHP)	117-81-7
Di-isobutyl phthalate (DIBP)	84-69-5
Di-isodecyl phthalate (DIDP)	26761-40-0; 68515-49-1

Chemical Name	CASRN
Di-isononyl phthalate (DINP)	28553-12-0; 68515-48-0
Dibutyl phthalate (DBP)	84-74-2
Dicyclohexyl phthalate (DCHP)	84-61-7
Ethylene dibromide	106-93-4
Formaldehyde	50-00-0
4,4' Methylene bis(2-chloraniline) (MBOCA)	101-14-4
Methylene chloride	75-09-2
N-Methylpyrrolidone (NMP)	872-50-4
o-Dichlorobenzene	95-50-1
Octahydro-tetramethyl-naphthalenyl-ethanone chemical category (OTNE))	54464-59-4; 54464-57-2; 68155-67-9; 68155-66-8
Octamethylcyclotetra siloxane (D4)	556-67-2
p-Dichlorobenzene	106-46-7
Perchloroethylene (PCE)	127-18-4
Phosphoric acid, triphenyl ester (TPP)	115-86-6
Phthalic anhydride	85-44-9
trans-1,2- Dichloroethylene	156-60-5
Trichlorethylene (TCE)	79-01-6
Tris(2-chloroethyl) phosphate (TCEP)	115-96-8
Vinyl Chloride	75-01-4

DoW Point of Contact: ODASW(EM&R) Chemical and Material Risk Management,  
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