



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

19 March 2020

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

His Excellency Thani Thongphakdi  
Embassy of Thailand  
1024 Wisconsin Avenue, NW  
Washington, DC 20007

Subject: Notice of Export of **Tricarboxylic acid (generic)** to THAILAND

Dear Mr. Ambassador:

Section 12(b) of the Toxic Substances Control Act (TSCA) requires any person who exports or intends to export a chemical substance or mixture from the United States to notify the United States Environmental Protection Agency (U.S. EPA) of such exportation if any of the following actions have been taken under TSCA with respect to that chemical substance or mixture:

- 1) Information is required under TSCA section 4 or 5(b),
- 2) An order has been issued under TSCA section 5,
- 3) A rule has been proposed or promulgated under TSCA section 5 or 6, or
- 4) An action is pending, or relief has been granted under TSCA section 5 or 7.

In turn, TSCA section 12(b) requires the U.S. EPA to notify importing governments of the availability of the required information submitted to the U.S. EPA under the applicable TSCA section 4 or 5(b) action or notify the importing government of the applicable TSCA section 5, 6, or 7 action or relief. See 15 U.S.C. 2611(b) and the U.S. EPA's TSCA section 12(b) regulations at Title 40, Part 707, Subpart D of the Code of Federal Regulations (CFR), for details concerning the TSCA section 12(b) export notification procedures.

The U.S. EPA previously received a notice regarding a chemical substance or mixture exported from the United States to your country. This chemical substance or mixture is currently subject to TSCA section 12(b) export notification because it is subject to one of the actions listed above.

Information specific to the chemical being exported to your country is as follows:

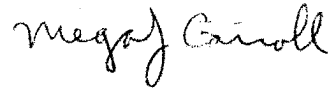
On January 23, 1984, EPA promulgated a TSCA section 6 rule regulating the use of a Tricarboxylic acid (generic). Combining Tricarboxylic acid (generic) with water and the triethanolamine produces a substance, identified generically as the triethanolamine salt of the tricarboxylic acid. The regulation prohibits the addition of nitrosating agents, including nitrites, to the triethanolamine salt of tricarboxylic acid, when that substance is or could be used in metalworking fluids. The addition of nitrites or other nitrosating agents to that substance leads to formation of a substance known to cause cancer in laboratory animals. Consult the regulation in the Title 40-Part 747.200 of United States Code of Federal Regulation and the associated Federal Register notice published on January 23, 1984 (page 2762) for further information.

Should you prefer that notice of this type be provided to an official or agency of your government other than you, please provide us with the appropriate name and address.

Additional information concerning these regulations and chemical can be found online at <https://www.epa.gov/tsca-import->

export-requirements/tsca-requirements-exporting-chemicals or by contacting me at 202-564-2814 or  
Carroll.Megan@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Megan Carroll".

Megan Carroll  
Deputy Director, Information Management Division  
Office of Pollution Prevention and Toxics  
Office of Chemical Safety and Pollution Prevention  
Tel: 202-564-2814 (desk)  
Email: Carroll.Megan@epa.gov