

The Honorable John McCain
United States Senate
Washington, DC 20515

Dear Senator McCain:

Thank you for your letter of June 11, 1999, expressing your concern about labeling zinc as a persistent, bioaccumulative, and toxic (PBT) chemical. As you know, zinc appeared as one of 53 chemicals proposed by the Agency for inclusion on the Draft Resource Conservation and Recovery Act (RCRA) PBT List. This Draft List, when final, will serve as the focus of the Agency's voluntary waste minimization initiatives. The Draft List was released for public comment on November 9, 1998, and the public comment period closed on February 16, 1999. Zinc was included on the Draft List because of its potential for ecosystem impacts, such as toxicity to fish when released into surface waters. We recognize that zinc also has beneficial properties, as your constituent noted.

During the comment period we received a number of public comments expressing concerns similar to those of your constituents regarding the placement of zinc and other metals on the Draft List. More specifically, these comments suggested we use bioavailability rather than persistence in evaluating metals, and suggested we reevaluate how some information is being used in the screening and ranking steps of the methodology used in developing the list of PBT chemicals. In an attempt to further understand these concerns, we also met with representatives from a number of metals trade associations and individual companies during the public comment period. Let me assure you that we will review these comments and issues carefully before deciding whether to include zinc on the Final RCRA List, which is scheduled for finalization in the Fall of 1999.

Again, thank you for providing your views on this matter.

Sincerely yours,

Elizabeth A. Cotsworth, Acting Director
Office of Solid Waste

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