

2026 Unified Regulatory Agenda: Upcoming Toxic Substances Control Act (TSCA) Actions

Released July 2026

On July 3, 2026, the current administration released its “2026 Regulatory Plan and the Unified Agenda of Federal Regulatory and Deregulatory Actions.” The U.S. Environmental Protection Agency’s [share of that agenda](#) details upcoming rulemakings, including TSCA-related rules. EPA’s agenda reflects the administration’s continued prioritization of revising Biden-era regulations, including chemical risk management rules, the reporting rule for per- and polyfluoroalkyl substances (PFAS), and procedures for existing chemical risk evaluations. EPA also aims to complete several TSCA risk evaluations in the coming months and has updated the regulatory actions on [its long-term actions list](#).

TSCA Risk Evaluation and Risk Management Rules for Existing Chemicals

EPA continues to have a robust workload for evaluating and regulating existing chemicals under Section 6 of TSCA (see the status of the [39 chemicals undergoing risk evaluation and risk management](#)).

- Risk Management Rules for the “First Ten” Chemicals:** Section 6(a) of TSCA mandates that EPA issue risk management rules necessary to mitigate the risks of chemical substances that the agency determines through risk evaluations present an unreasonable risk of injury to health or the environment. EPA began evaluating 10 chemicals in December 2016 and has issued final risk management rules for five of those chemicals. Currently, all five final risk management rules are being litigated, and EPA has taken steps toward revising, issuing guidance, or delaying compliance deadlines with respect to each. EPA has issued proposed risk management rules for another three of the “first ten” chemicals.

	“First Ten” Chemical	Risk Management Rule		Revisions to Risk Management Rule?	Revised Risk Management Rule	
		Proposed Rule	Final Rule		Proposed Rule	Final Rule
1.	Asbestos Part 1: Chrysotile Asbestos *	April 2022	March 2024	EPA is considering guidance to clarify workplace protection requirements	N/A	N/A
2.	Methylene chloride	May 2023	May 2024	EPA is proposing to extend compliance dates**	N/A	N/A
3.	Perchloroethylene (PCE)	June 2023	Dec. 2024	EPA is proposing to extend compliance dates***; EPA is considering amendments, and intends to solicit comments through a	Expected July 2026	Expected July 2027

	“First Ten” Chemical	Risk Management Rule		Revisions to Risk Management Rule?	Revised Risk Management Rule	
		Proposed Rule	Final Rule		Proposed Rule	Final Rule
				NPRM		
4.	Trichloroethylene (TCE)	Oct. 2023	Dec. 2024	EPA is proposing to extend compliance dates**; EPA is considering amendments and intends to solicit comments through a NPRM	Expected July 2026	Expected July 2027
5.	Carbon tetrachloride (CTC)	July 2023	Dec. 2024	EPA proposing to extend compliance dates**; EPA requested comment on how to amend	Expected July 2026	Expected Sept. 2027
6.	1-Bromopropane	August 2024	Expected Aug. 2026			
7.	N-Methylpyrrolidone (NMP)	June 2024	Expected July 2026			
8.	C.I. pigment violet 29 (PV29)	Jan. 2025	Expected July 2026			
9.	Cyclic aliphatic bromide cluster (HBCD)	Expected Sept. 2026	Expected July 2027			
10.	1,4-Dioxane	TBD (long-term action)				

*The [Asbestos Part 2: Legacy Uses](#) rule is expected to be proposed in February 2027 and finalized March 2028.

**EPA previously extended compliance dates via interim final rules. The regulatory agenda contains [another proposal](#) to further extend the compliance dates, with the proposal expected July 2026 and the final rule expected October 2026.

- **Additional Risk Management Rules:** EPA’s regulatory agenda also includes future risk management rules for:
 - [DIDP](#) – proposed rule expected July 2026; final rule expected July 2027
 - [Formaldehyde](#) - proposed rule expected August 2026; final rule expected August 2027
 - [DINP](#) – proposed rule expected November 2026; final rule expected October 2027
 - [TCEP](#) – proposed rule expected December 2026; final rule expected December 2027
 - Although not on the regulatory agenda, EPA also finalized a risk evaluation for [1,1-dichloroethane](#) in June 2025, and the chemical will proceed to risk management.
- **Additional Prioritization and Potential Actions:** In December 2024, EPA designated five more chemicals as high-priority for risk evaluation: Acetaldehyde; Acrylonitrile; Benzenamine; Vinyl Chloride; and 4,4'-Methylene bis(2-chloroaniline) (MBOCA). The same month, EPA [initiated review of another five chemicals](#) for prioritization: 4-*tert*-Octylphenol (4-(1,1,3,3-Tetramethylbutyl)-phenol); Benzene; Ethylbenzene; Naphthalene; and Styrene. The current administration continues to evaluate whether and how to revise the prior high-priority designations and how to proceed with the open prioritization review. Meanwhile, in May 2026, EPA extended the reporting deadline to May 31, 2027, under a [separate but related TSCA Section 8\(d\) health and safety data reporting rule](#) that includes these ten

chemicals, among others (the regulatory agenda includes [another proposal for extending the reporting rule's deadlines](#)). Finally, EPA is considering potential regulatory action on [6PPD](#) in response to a TSCA Section 21 petition.

Procedures for Chemical Risk Evaluation

On May 3, 2024, EPA finalized amendments to the procedural framework rule for conducting risk evaluations under TSCA. The 2024 rule amendments require EPA: to make one risk determination for the “whole chemical” rather than separate risk determinations for each condition of use; to consider “overburdened communities”; not to assume the use of personal protective equipment when making risk determinations; and not exclude any condition of use of a chemical in the risk evaluation. The 2024 rule amendments currently are being litigated. Meanwhile, the current administration proposed another rule on September 23, 2025, “Further Reconsideration of Procedures for Chemical Risk Evaluation,” which essentially removes the 2024 rule amendments. EPA received public comment on that proposed rule in November 2025. According to the [regulatory agenda](#), “EPA intends to promulgate a final rule in 2026.”

Revised Risk Management Rules for PBT Chemicals

Under TSCA Section 6(h), EPA has taken action to reduce exposures to certain chemicals that are persistent, bioaccumulative and toxic (“PBT”). In October 2024, EPA issued a final rule (effective January 21, 2025) amending the rules for two PBT chemicals: decabromodiphenyl (decaBDE) and phenol, isopropylated phosphate (3:1) (PIP (3:1)). Hearing a legal challenge to the 2024 rule, in May 2026 the U.S. Court of Appeals for the Ninth Circuit remanded without vacatur the rule to EPA for renewed rulemaking. The 2024 rule will remain in place during the pendency of further agency proceedings.

TSCA Risk Management Rules and Critical Uses for Federal Agencies

EPA is developing a proposed rule under the Toxic Substances Control Act (TSCA) that would allow Federal agencies or their contractors to temporarily continue using certain chemical substances under certain conditions of use (e.g., methylene chloride) when necessary to prevent significant disruptions to the national economy, national security, or critical infrastructure. While it previously appeared on the long-term action list, EPA has [added this proposal to the regulatory agenda](#), with a proposed rule expected in December 2026.

Reporting and Recordkeeping

In November 2025, EPA issued a [proposed rule](#) to amend the TSCA Section 8(a)(7) regulation for reporting and recordkeeping requirements for perfluoroalkyl and polyfluoroalkyl substances (PFAS). As promulgated in October 2023, the regulation requires manufacturers (including importers) of PFAS in any year between 2011-2022 to report certain data to EPA related to exposure and environmental and health effects. EPA is considering incorporating certain exemptions and other modifications to the scope of the reporting rule. According to the regulatory agenda, EPA expects a final rule in July 2026. Meanwhile, in April 2026, EPA finalized an extension of the reporting period for TSCA Section 8(a)(7) submissions by 60 days following the effective date of the final rule, once issued.

New Chemicals and Significant New Use Rules (SNURs)

EPA is pursuing a series of SNURs for certain chemicals that would require companies to submit significant new use notices (SNUNs) at least 90 days prior to manufacturing (including importing) or processing the chemical for

that significant new use. EPA intends to propose or has proposed SNURs for certain “non-ongoing” (meaning phased out) uses of “[phthalates](#),” “[flame retardants](#),” “[certain solvents](#),” and [other chemicals undergoing risk evaluation](#). EPA has placed these SNURs on the long-term actions list with no clear timelines (i.e., “TBD”).

Lead and Lead-Based Paint (Long-Term Actions)

- **Lead; Renovation, Repair, and Painting (RRP) Program for Public and Commercial Buildings**: On April 22, 2008, EPA issued a final rule to address lead-based paint hazards created by RRP activities in target housing and child-occupied facilities. Following publication, the rule was challenged and EPA agreed to commence proceedings to determine whether renovations of public and commercial buildings create hazards. EPA is continuing work on this effort with no definitive timeline to completion.
- **Reconsideration of the Definition of Lead-Based Paint**: Per a 2021 court decision, EPA is reconsidering the definition of “lead-based paint” and intends to solicit public comment through a notice of proposed rulemaking. While it has made some progress, the Agency continues this work with no clear timeline for the anticipated NPRM.
- **Reconsideration of the Soil-Lead Hazard Standards**: EPA is reviewing the existing regulatory soil-lead hazard standards (SLHS) for target housing and child-occupied facilities. EPA intends to issue an NPRM in July 2027.

Hunton Andrews Kurth LLP’s environmental team has the legal knowledge and scientific background required to address chemical regulatory and compliance challenges. Our [chemical and product stewardship](#) attorneys work together to create comprehensive strategies for our clients nationwide.

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