Published on The National Law Review https://natlawreview.com

## All Things Chemical: EPA and PBTs: A New Normal? — A Conversation with Richard E. Engler, Ph.D. [PODCAST]

Article By:		
Lynn L. Bergeson		

This week's All Things Chemical<sup>®</sup> Podcast will be of interest to readers of the TSCAblog<sup>®</sup>. A brief description of the episode written by Lynn L. Bergeson is below.

This week I sat down with Richard E. Engler, Ph..D., Director of Chemistry with Bergeson & Campbell, P.C. (B&C®) and The Acta Group (Acta®), to discuss the U.S. Environmental Protection Agency's (EPA) continuing struggle to regulate certain persistent, bioaccumulative, and toxic (PBT) chemicals, especially those found in finished products, what EPA refers to as "articles." The Toxic Substances Control Act (TSCA) has always applied to the products, or articles, that contain chemical substances of interest to EPA under TSCA. While EPA previously used that authority somewhat sparingly, the 2016 Amendments to TSCA have jump-started a new wave of regulations that expressly apply to articles. EPA is required under TSCA to regulate certain PBTs, and EPA issued a final rule earlier this year that inspired chaos in the business community, especially in the electronics sector and its complicated supply chain. Rich and I discuss these PBT rules and help explain what may well be the new normal with regard to the regulation of finished products under TSCA.

©2025 Bergeson & Campbell, P.C.

Richard E. Engler, Ph.D.

National Law Review, Volume XI, Number 263

Source URL: <a href="https://natlawreview.com/article/all-things-chemical-epa-and-pbts-new-normal-conversation-richard-e-engler-phd">https://natlawreview.com/article/all-things-chemical-epa-and-pbts-new-normal-conversation-richard-e-engler-phd</a>