

PPG

INTER-OFFICE CORRESPONDENCE

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Date: August 2, 1984
From: A. P. Leber
Location: 36 West
Subject: 7/24/84 Public
Meeting on TCE/PCE/
VDC Health Assessment
Documents

The new EPA staffer with the SAB (Dr. Byrd) discussed recent history of the HADs, and mentioned that EPA's OHEA (Office of Health & Environmental Assessment) and the SAB have disagreed on the cancer classifications for the subject materials (EPA wanted Class 2B designations; whereas, the SAB thought they should be Class 3 materials). He indicated the Agency was expecting more information this summer from Maltoni on VDC and perhaps TCE. Maltoni is expected to publish his data, but it appears that it may not be peer reviewed since it is to be a monograph.

Dr. Duell, of the SAB (PPG consultant), suggested again that the Agency should develop one document per chemical on adverse health effects. Too often documents are generated from the Air or Water office which are not consistent with the HADs. Separate documents could then be generated for risk assessments.

It was also suggested by Dr. Kurshner (SAB) that the EPA may want to bring in experts on rodent liver tumors since this was the major issue on the chlorinated compounds. Dr. Byrd then indicated that this would not be necessary before issuance of SAB "letters" to the Administrator on their findings for the three HADs. Byrd then made several statements to ascertain that he understood SAB's position on these issues. The first was that there were some errors and that they should be corrected (a real gimme). Then he stated that the information on these chemicals, while not always presented clearly, was "adequate to classify these chemicals under Section 112 of the Clean Air Act." There was no response from the SAB which implicitly gave approval.

There were two interpretations to this statement on the part of the HSIA attendees. The first was that Byrd was asking for SAB's concurrence that these should be listed as hazardous under Section 112. It is understood that a chemical must meet an IARC Class 2B "sufficient" category to be listed. The more plausible explanation (supported by Bell's conversations with Byrd and others) is that the documents are adequate for making a determination as to whether these materials should be listed. This is a real problem since there was no discussion about recent momentum on the part of the SAB to discount EPA's contention that the chemicals should be considered "probable human carcinogens." Therefore, presumably any closure letter sent to 1

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Administrator from the SAB would not reflect SAB's contention but rather EPA's long-standing position on these chemicals.

HSIA's Paul Cammer has agreed to find out all he can about the outcome from EPA staffers, and to procure a copy of SAB closure letter, if possible, before issuance. Secondly, HSIA toxicologist will make contact with SAB members to get their understandings and to urge their careful review before formal issuance of any letter to the Administrator. Industrial Tox will follow progress of these actions.

Phil/mec

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mec

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