



File
CMA

CHEMICAL MANUFACTURERS ASSOCIATION

February 25, 1987

TO: IARC PROJECT PARTICIPANTS

FROM: Nancy G. Doerrer *Nancy*
Associate Director
Health, Safety and Chemical Regulations

SUBJECT: Draft IARC Working Papers: March 1987 Monograph Meetings

Attached for your review are draft working papers from IARC on the chemical(s) for which you recently submitted summaries and bibliographies. These working papers will be used by the IARC Committee when they meet in Lyon, France, from 10-18 March 1987 to evaluate the carcinogenicity of these chemicals to humans.

A summary table on genetic activity for your chemical(s) has been included (if available) with the IARC materials. This table is the outcome of the December 1986 IARC Monograph meetings.

Also attached are four appendices that list chemicals with differing degrees of evidence for carcinogenicity in experimental animals. These chemicals were not part of IARC's original list to be considered in March 1987, yet have now been designated for carcinogenic evaluation at the upcoming meetings. If you have a specific concern about any of these added chemicals, or the one(s) for which you submitted information to CMA in recent months, please contact the CMA Observer to the March 1987 IARC Monograph Meetings at the address or phone number below:

Robert J. Moolenaar, Ph.D.
Dow Chemical Company
1803 Building
Midland, MI 48640
517/636-0655

Please feel free to contact me at 202/887-1282 if you have any questions.

Attachments

cc: R.J. Moolenaar, Dow Chemical Company
D. Matheson, Stauffer Chemical Company
R.P. Schumacher, CMA
G. Williamson, CMA

OLI 4097



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OLI 4098



CHEMICAL MANUFACTURERS ASSOCIATION

April 2, 1987

TO: Toxicologists Work Group
Dr. Harry Skalsky

FROM: Dr. Joseph McDade, Leader
Ann M. Mason, staff

SUBJECT: Carcinogenic Constituents List

Our next assignment has arrived! In mid-April Protection Agency expects to publish a massive proposal regulating the burning of hazardous wastes as fuel. One integral portion of this rule is the proposed health values addressing both 86 threshold constituent carcinogenic constituents. A list of these 134 chemicals as Appendix A & B. These two lists, reportedly, list constituents and levels as they will appear in the

The values shown in both of these lists are based on an undisclosed method. Hopefully, an examination of background document addressing human risk will identify background document will be sent to you as soon as it can be photocopied.

In the meantime, please examine the list of chemicals. To assist our comment organization, we have identified companies with each chemical based on data available in SRI Chemical Producers Index: Exhibit 1 (Appendix A constituents); Exhibit 2 (Appendix B constituents). We realize that this may not accurately reflect the current production at some company operations.

Each member is asked to examine the list and call Ann Mason or Marci Siegel with a list of those chemicals on which you will comment voluntarily. Please call Ann or Marci by April 10. From this list, we will send you any additional documents we get relating to the specific chemical.

Our first meeting has been set for May 5, 1987, at CMA. Please plan to attend. If you cannot attend, please send an alternate company representative who can express your company's position. With any luck and with your cooperation, hopefully, we can complete our assigned task on schedule. In the past the Office of Solid Waste has not yielded from the

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*Review of
Hazard*

*Len Kruse
Pls reply*

*9 handle for me
Have someone attend only if
necessary.*

*Ros
4/6/87*

*We do not produce
2-4-DNT
pyridine
E.O.
Methylene Chloride
Mercury
Pb
20 comments of this
time - J. HKS*

*HCl
Pb
Hg
Pyridine
ED*

*Hydrazine
Methylene
chloride
2,4-DNT*

now!



CHEMICAL MANUFACTURERS ASSOCIATION

April 2, 1987

TO: Toxicologists Work Group
Dr. Harry Skalsky

FROM: Dr. Joseph McDade, Leader
Ann M. Mason, staff

SUBJECT: Carcinogenic Constituents List

Our next assignment has arrived! In mid-April, the Environmental Protection Agency expects to publish a massive proposed rulemaking regulating the burning of hazardous wastes as fuel in industrial boilers. One integral portion of this rule is the proposed variance based on human health values addressing both 86 threshold constituents and 48 carcinogenic constituents. A list of these 134 constituents is included as Appendix A & B. These two lists, reportedly, represent the list of constituents and levels as they will appear in the Federal Register.

The values shown in both of these lists are based on an, as yet, undisclosed method. Hopefully, an examination of the portion of the background document addressing human risk will identify EPA's method. The background document will be sent to you as soon as it can be photocopied.

In the meantime, please examine the list of chemicals. To assist our comment organization, we have identified companies with each chemical based on data available in SRI Chemical Producers Index: Exhibit 1 (Appendix A constituents); Exhibit 2 (Appendix B constituents). We realize that this may not accurately reflect the current production at some company operations.

Each member is asked to examine the list and call Ann Mason or Marci Siegel with a list of those chemicals on which you will comment voluntarily. Please call Ann or Marci by April 10. From this list, we will send you any additional documents we get relating to the specific chemical.

Our first meeting has been set for May 5, 1987, at CMA. Please plan to attend. If you cannot attend, please send an alternate company representative who can express your company's position. With any luck and with your cooperation, hopefully, we can complete our assigned task on schedule. In the past the Office of Solid Waste has not yielded from the

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comment date. We cannot, and should not, count on any more than 60 days to review the appropriate documents and reply to EPA.

Joining us in our effort will be Neil King, as external legal counsel, and a consultant toxicologist.

We at CMA look forward to working with you. Please call Marci Siegel (202-887-1175) or Ann Mason (202-887-1180) if you have any questions.

xc: Environmental Management Committee - please route to the appropriate person

—Rob Bradford - please route to the appropriate person

Dave Cannon
Neil King
Janet Matey
Betty Moran
Tom Robinson
Bob Romano
Has Shah
Carol Stack
Mike Walls

APPENDIX A

REFERENCE AIR CONCENTRATIONS (RACs)
FOR THRESHOLD CONSTITUENTS

Constituent	Maximum Annual Average Ground Level Concentration ($\mu\text{g}/\text{m}^3$)
acetonitrile	10
acetophenone	500
acrolein	0.25
aluminum phosphide	0.25
allyl alcohol	5
antimony	0.25
barium	50
barium cyanide	50
benzidine	0.5×10^{-5}
bis(2-ethylhexyl)phthalate	17
bromomethane	0.7
calcium cyanide	25
carbon disulfide	200
chloroane	5×10^{-3}
2-chloro-1,3-butadiene	2.5
chloromethane	0.7
chromium III	1,000
copper cyanide	50
cresols	100
cyanide(free)	17
cyanogen	25
di-n-butyl phthalate	10
o-dichlorobenzene	10
dichlorodifluoromethane	170
2,4-dichlorophenol	2.5
1,3-dichloropropene	0.25
diethyl phthalate	10
dimethoate	1.0
2,4-dinitrophenol	1.0
diphenylamine	225
endosulfan	0.01
endrin	0.05
flourine	50
formaldehyde	2×10^{-3}
formic acid	1700

APPENDIX A (continued)

Constituent	Maximum Annual Average Ground Level Concentration ($\mu\text{g}/\text{m}^3$)
thallous oxide	0.25
thallium	500
thallium (I) acetate	0.5
thallium (I) carbonate	0.25
thallium (I) chloride	0.5
thallium (I) nitrate	0.5
thallium selenite	0.5
thallium (I) sulfate	0.5
toluene	500
1,2,4-trichlorobenzene	17
trichloromono-fluoromethane	250
2,4,5-trichlorophenol	100
vanadium pentoxide	17
vinyl chloride	0.05

APPENDIX B (continued)

Constituent	Risk Specific Dose ($\mu\text{g}/\text{m}^3$)
Nickel (carbonyl & disulfide)	3×10^{-2}
2-Nitropropane	4×10^{-3}
N-Nitroso-N-methylurea	1×10^{-5}
N-Nitrosopyrrolidine	2×10^{-2}
Pentachloronitrobenzene	1×10^{-1}
Pronamide	2
Reserpine	3×10^{-3}
1,1,2,2-Tetrachloroethane	2×10^{-5}
Tetrachloroethylene	21
Thiourea	2×10^{-2}
Trichloroethylene	8

EXHIBIT 1

APPENDIX A CONSTITUENTS

<u>CHEMICAL</u>	<u>COMPANY (based on SRI information)</u>
acetonitrile	E. I. du Pont de Nemours & Co. Petrochemicals Department Intermediates Division Standard Oil Company (Ohio)
acetophenone	Allied Signal, Inc. Atlantic Richfield Co. ARCO Lyondell Petrochemical Co. Georgia Gulf Corp. Givaudan Corporation Texaco, Inc.
acrolein	Union Carbide Corp. Solvents & Coating Division
aluminum phosphide	none listed (but phosphate listed)
phosphate (unspecified)	Chesebrough-Pond's, Inc. Stauffer Chemical Company Basic Chemicals Division
phosphate (mono)	Chesebrough-Pond's, Inc. Stauffer Chemical Company Basic Chemicals Division Tenneco, Inc. Albright & Wilson, Inc.
allyl alcohol	FMC Corp. Industrial Chemical Group
antimony	ASARCO Allied Signal Harshaw/Fitrol Laurel Industries, Inc. McGean-Rohco, Inc. M & T Chemicals, Inc. Pennwalt Corp., Ozark-Mahoning Stauffer
barium	Barium & Chemicals, Inc. Chemical Products Corporation Deepwater, Inc. Ferro Corporation Transelco Division General Electric Company G. Frederick Smith Company GTE Corporation Harshaw/Filtrol Partnership

2,4,5-trichlorophenol

not listed

vandium pentoxide

Associated Minerals & Metals
Gulf
Atlas
Intercontinental - Somex
Kerr-McGee
Union Carbide Corporation

vinyl chloride

Stauffer
Borden
Dow
Formosa
Georgia Gulf
BFGoodrich
PPG
Shell
Vista
Air Products & Chemicals
Polymer Chem.