

## AIR RESOURCES BOARD

1102 Q STREET  
P.O. BOX 2815  
SACRAMENTO, CA 95812

FEB 19 1991



February 8, 1991

Jonathon T. Busch, Manager  
Vinylidene Chloride Panel  
Chemical Manufacturers Association  
2501 M Street, N.W.  
Washington, D.C. 20037

From: BUSCH  
RE: VDC 191-007  
Date: 2/14/91

Dear Mr. Busch:

Comments on the Proposed Toxic Air Contaminant Identification List

Thank you for your January 8, 1991 letter to Mr. Venturini in which you commented on the proposed revision to the definition for Category III. You state that the proposed definition for Category III may imply an unintended finding regarding the potency or toxicity of the substances listed under Category III (IIIA or IIIB).

The proposed revision to the definition for Category III is to clarify the factors that will be considered when the substances listed under Category III are evaluated for entry into Category II (IIA or IIB). Specifying the factors considered during the evaluation does not infer knowledge about the toxicity or potency of substances listed under Category III.

The basis for listing substances under Category III is specific. Subcategory IIIA consists of "Substances known to be emitted in California (includes Hazardous Air Pollutants identified in the Federal Clean Air Act known to be emitted in California)." Subcategory IIIB consists of "Substances identified as Hazardous Air Pollutants in the Federal Clean Air Act for which California emissions information is not currently available."

We believe that we are providing important information to the public by listing the factors that are considered prior to elevating substances from Category III to Category II. By defining Category III this way, the list can stand alone from the staff report which describes how substances are moved up in priority.

SL 063618

Jonathon T. Busch, Manager

-2-

February 8, 1991

Thank you for taking the time to respond to our request for information. If you have any questions regarding this letter or the proposed Toxic Air Contaminant Identification List, please call me at (916) 322-7072.

Sincerely,



Genevieve Shiroma, Chief  
Toxic Air Contaminant  
Identification Branch

SL 063619