CHEMICAL MANUFACTURERS ASSOCIATION

January 3, 1983

ALERT

TO : CMA Legal and TSCA Contacts
PCB Legal Contacts

FROM : Program Manager, CMA Polychlorinated Biphenyls Program

SUBJECT: EPA Action on PCBs

> CMA's PCB Panel suggests that each CMA member evaluate the enclosed EPA document to determine an appropriate company response. The PCB data collection described involves a schedule that prevents the CMA PCB Panel from responding on behalf of all of the Association's members.

EPA convened a meeting on December 20, 1982, to outline for various industry groups its strategy for the development of their next Polychlorinated Biphenyl (PCB) rulemaking. The enclosed document, distributed by the Agency at that meeting, outlines the type of data EPA is seeking to support granting regulatory exclusions under the planned rule. EPA intends to complete its data-gathering efforts by April 1, 1983, and to publish a proposed rule by December 1, 1983.

The information outlined in the handout is to be used by the Agency in developing exposure assessments for each chemical believed to contain inadvertently generated PCBs. The exposure assessments will be used in conjunction with hazard evaluations in order to develop quantitative risk assessments that will be the basis for excluding chemicals or processes from PCB regulation. Tables 1 and 2 of the handout identify the chemicals that EPA believes may contain PCBs. The Agency is particularly interested in learning which of these chemicals, based on monitoring data or knowledge of production processes, do not contain PCBs and which already qualify for the second PCB rule "closed and controlled waste manufacturing" exclusion.

The enclosed document is being transmitted as a "for your information" item. The specified timetable will not allow the CMA PCB Panel to conduct, design, distribute and collect information in a separate CMA survey. As of this date, the PCB Panel has not met to establish any substantive positions or other recommendations, and timing is such that each company must choose its own course of action.

CMA's PCB Program Panel has encouraged the Agency to use to a greater extent the CMA survey data submitted on November 25, 1981. CMA told the Agency that EPA possesses sufficient information to justify a reasonable regulatory cutoff level for the manufacture, processing, distribution and use of chemicals containing trace quantities of PCBs. CMA was told that the survey data were not sufficiently specific to support third rule exclusions.

It is important to note that EPA will not officially request the information outlined in the handout. Rather, the Agency is only encouraging industry to supply the information by April 1. Without the data, the Agency will rely on "worst case reasonable" assumptions in determining chemicals and processes that should qualify for an exclusion. Although CMA has urged the Agency to publish a request for needed information in the Federal Register, the Agency has indicated that time constraints will not permit it to do so.

If you have any questions relating to the development of the next PCB rule or the enclosed document, the EPA contact is David Dull, Chief of the Chemical Control Branch, (202)382-3935. Additional information on the CMA PCB Program Panel can be obtained from me at (202)887-1189.

Robert J. Fensterheim

Enclosure

0755245

MEETING AGENDA

SUBJECT: Data necessary to justify exclusions under the uncontrolled PCBs rulemaking

TIME/PLACE: 2:00-3:15 PM, Monday, December 20, 1982
401 M Street, SW, Washington, DC, Room 2814A

BACKGROUND MATERIALS: Attached Paper - Data necessary to support exclusions under the uncontrolled PCBs rulemaking

OBJECTIVES: To outline for industry EPA's strategy for the uncontrolled PCBs rulemaking and to describe the data necessary to support exclusions under this rulemaking.

Order of Agenda Items

1.	Introduction	15 minutes
	a. Purpose of the meeting - Marty Halper	
	b. Overview of the current rulemaking strategy - David Dull	
2.	Presentation of data necessary to support exclusions	
	a. Exposure assessment - Mike Callahan	20 minutes
	b. Economic impact analysis - Amy Moll	10 minutes
3.	Question and discussion period - Marty Halper	25 minutes
4.	Closing statement - Marty Halper	5 minutes

0755246

DATA NECESSARY TO SUPPORT EXCLUSIONS
UNDER THE UNCONTROLLED PCBs RULEMAKING

MANUFACTURE

1. A better identification of the products of the processes that produce PCBs. Table 1 and Table 2 of the attached list identify all the chemicals we presently know that may contain PCBs generated during production. We would like to determine which of these products contain PCBs, and which, based on monitoring data or knowledge of their production processes, do not contain PCBs. We will also have to determine if there are any products not on the list which may contain PCBs generated during production.

2. A description of the physical state of the chemical produced (solid, liquid, gas).

3. The quantities of PCBs, product, and solid waste produced during the production of chemicals identified in number 1, and the expected range of concentration of PCBs expected in products and waste streams.

4. The annual production of the chemical for the past 5 years.

5. A listing of uses for the products identified in number 1, including all chemicals produced or processed downstream and the percentage of the total production that these chemicals represent.

INTERMEDIATE PRODUCTS

1. A description of processes where chemicals containing PCBs are used as feedstocks, including a description of the following items:

- Quantities of product and solid waste produced.
- Average annual production over the last 5 years.
- Range of concentrations or maximum concentration of PCBs expected in process streams, waste streams, byproducts, and products.
- Physical state of PCBs produced (solid, liquid, gas).
- Description of the methods of disposal of wastes.

2. An identification and short (three words) job description of employees who may be exposed to PCBs. The number

0755247

of employees that would be exposed to PCBs. Identification of points in the process where exposures may occur, such as points of manual transfers or open operations at elevated temperatures.

INDUSTRIAL END-USES

1. A description of the industrial and commercial end-uses of products containing inadvertently-produced PCBs [Examples: metal degreasing, pigments in textiles], including a description of the following items:

- Concentrations of PCBs in the product.
- Physical state of the product (solid, liquid, gas).
- Description of the methods for disposal of the waste stream.

2. An identification and short (three words) job description of employees who may be exposed to PCBs. Identification of operations where exposure to PCBs is likely (e.g. manual handling and transfer of products containing PCBs, products used in powdered form, etc.).

CONSUMER PRODUCTS

1. A description of consumer products containing PCBs (for example, polymers or paints), including the concentration of PCBs in the consumer product.

GENERAL

1. Any available environmental monitoring data on individual isomers or small groups of isomers.

2. The percentage of annual production that was exported outside the U.S. (for material balance purposes).

3. The cost of filing an exemption petition.

TABLE 1. SUMMARY OF ORGANIC CHEMICAL PRODUCT CLASSES POTENTIALLY CONTAINING INADVERTENTLY GENERATED PCBs.*

Chlorinated Compounds Produced Using Direct Chlorination	Chlorinated Compounds Produced Using Chlorinated Feedstocks	Non-Chlorinated Compounds Produced Using Chlorinated Feedstocks	
Compound(s)	Compound(s)	Compound(s)	IPPEU No.**
PETROLEUM FEEDSTOCK: BENZENE			
Chlorinated Benzenes	Chloronitrobenzenes	Phenol	8
Chlorinated Phenols	Dichloronitrobenzenes	Aniline	9
Hexachlorocyclohexane	Dichloroanilines	o-Phenylenediamine	28
Chloroanilines	Chlorinated Methyl Phenols	o-, p-Nitroanilines	29
Trichloroanilines	Chlorophenyl Phenylethers	Diphenylamine	34
	Chlorinated Benzidines	Acetanilide	17
PETROLEUM FEEDSTOCK: ETHYLENE			
Mono-,Di-Chloroacetic Acid	Ethyl Chloroacetate	Glycine	108
Sodium Chloroacetate	Vinyl Chloride	Cyanoacetic Acid	111
Chlorinated Ethanes	Vinylidene Chloride	Sodium, Carboxymethyl Cellulose	112
Chlorinated Ethylenes	Bis (2-Chloroethyl) Ether	Ethyl Cellulose	118
Ethylene Chlorohydrin	Chlorinated Acetophenones	Ethylene Diamine	134
Chlorinated, Fluorinated Ethanes	Choline Chloride	Aminoethylethanolamine	135
Chlorinated, Brominated Ethylenes	Hexachlorobutadiene	Mono-,Di-, and Triethylene Glycol Ethers	150
Chlorinated, Fluorinated Ethylenes			
Chlorinated Acetaldehyde		Tetramethyethylene Diamine	(3341)
Chlorinated Acetyl Chloride			
Hexachlorobenzene			
PETROLEUM FEEDSTOCK: METHANE			
Chlorinated Methanes	Chlorinated, Fluorinated Methanes	Carbon Tetrabromide	162
Phosgene	Chlorinated, Brominated Methanes	Carbon Tetrafluoride	(812)
Tetrachloroethane	Bis(Chloromethyl)Ether		
Chlorodifluoroethane	Cyanuric Chloride		
Perchloromethyl Mercaptan	Trichloroethylene		
Cyanogen Chloride			

0755249

TABLE 1. SUMMARY OF ORGANIC CHEMICAL PRODUCT CLASSES POTENTIALLY CONTAINING INADVERTENTLY GENERATED PCBs.* (continued)

Chlorinated Compounds Produced Using Direct Chlorination	Chlorinated Compounds Produced Using Chlorinated Feedstocks	Non-Chlorinated Compounds Produced Using Chlorinated Feedstocks	
Compound(s)	Compound(s)	Compound(s)	IPPEU No.**
PETROLEUM FEEDSTOCK: NAPHTHALENE			
Chloronaphthalenes			
Tetrachlorophthalic anhydride			
PETROLEUM FEEDSTOCK: PARAFFINS			
n-Propyl Chloride		n-Propylamine	231
Carbon Tetrachloride		Butyronitrile	232
Perchloroethylene		Amyl Amines	243
Hexachloroethane		Amyl Alcohols	244
Amyl Chlorides		Amyl Mercaptans	245
Chloroprene		Benzophenone	249
Hexachlorocyclopentadiene		Linear Alkylbenzenes	(2417)
Methallyl Chloride			
PETROLEUM FEEDSTOCK: PROPYLENE			
Dichlorohydrin	Epichlorohydrin	Isopropyl Phenols	272
Chloranil	Bis(2-Chloroisopropyl)Ether	Propylene Oxide	286
Propylene Chlorohydrin		Anisole	302
Chlorinated Propanes		Allyl Alcohol	317
Chlorinated Propylenes		Glycerol	318/319
		Propyl Amines	(1446)
PETROLEUM FEE: TOLUENE			
Benzyl Chloride	Benzoyl Chloride	Benzyl Alcohol	334
Benzyl Dichloride		Benzyl Amine	335
Benzyl Trichloride		Benzamide	337
Chlorotoluenes		Toluenesulfonamide	358
Chlorobenzaldehyde		Benzoyl Peroxide	(495)

TABLE 1. SUMMARY OF ORGANIC CHEMICAL PRODUCT CLASSES POTENTIALLY CONTAINING INADVERTENTLY GENERATED PCBs.* (continued)

Chlorinated Compounds Produced Using Direct Chlorination	Chlorinated Compounds Produced Using Chlorinated Feedstocks	Non-Chlorinated Compounds Produced Using Chlorinated Feedstocks	
Compound(s)	Compound(s)	Compound(s)	IPPEU No.**
PETROLEUM FEEDSTOCK: TOLUENE (continued)			
Chlorobenzoic Acids & Esters			
Chlorobenzoyl Chlorides			
Toluenesulfonyl Chloride			
Chlorobenzotrichlorides			

FOOTNOTES:

* This list was generated based on a systematic review of the organic chemical manufacturing process descriptions for approximately 600 chemicals presented in the following documents:

U.S. Environmental Protection Agency - 1977. Industrial process profiles for environmental use: Chapter 6. The Industrial Organic Chemicals Industry. Cincinnati, Ohio: U.S. Environmental Protection Agency, Office of Research and Development. EPA-600/2-77-0231.

U.S. Environmental Protection Agency - 1980. The Revised Organic Chemical Producers Data Base System. Cincinnati, Ohio: U.S. Environmental Protection Agency, Office of Research and Development. EPA-600/2-80-164.

** The IPPEU No. refers to the process description in the 1977 U.S. EPA document cited above. Those numbers bracketed by parentheses refer to the OCPDB numbers in the 1980 U.S. EPA document cited above.

TABLE 2. ADDITIONAL ORGANIC CHEMICAL PRODUCT CLASSES POTENTIALLY CONTAINING INADVERTENTLY GENERATED PCBs NOT SPECIFICALLY LISTED IN TABLE 1

PETROLEUM FEEDSTOCK: ETHYLENE

Chlorinated Acetonitriles
Chlorodifluoro Acetic Acid
Chlorinated Ethylamines
2-Chloroethyl Phosphonic Acid

PETROLEUM FEEDSTOCK: METHANE

Alkyl Chloroformates
Aryl Chloroformates
Chloromethyl Phosphonic Dichloride
2,2,2-Trifluoroethyl Trichloromethane Sulfonate
Trichloromethane Sulfonyl Chloride
Chloromethyl Phenyl Sulfide
Chloromethyl Methyl Sulfide

PETROLEUM FEEDSTOCK: PROPYLENE

Chlorinated Propanols
Chlorinated Propanediols
Aliphatic-Chloroacrylates
Chloral
2-Chloropropionamide
Ethyl - Chloropropionamide
Ethyl - Chloropropionate
B-Chloropropionitrile
Chloroacetone
2-Chloro-N,N-Dimethyl (n and iso) Propylamine
3-Chloro-2-Hydroxypropane Sulfuric Acid

PETROLEUM FFEDSTOCK: TOLUENE

Chlorinated Benzylamines
Chlorendic Diesters
Fluorobenzyl Chloride
Fluorobenzoyl Chloride
Chlorotrifluorotoluene

0755252

TABLE 2. ADDITIONAL ORGANIC CHEMICAL PRODUCT CLASSES
POTENTIALLY CONTAINING INADVERTENTLY GENERATED PCBs
NOT SPECIFICALLY LISTED IN TABLE 1 (continued)

ETROLEUM FFEDSTOCK: TOLUENE (continued
Dichlorobenzotrichloride
Dichlorobenzotrifluoride
Amino-Chlorobenzotrifluoride
Chlorofluorotoluene
Dimethoxy Benzoyl Chloride
Chlorofluorobenzyl Chloride
Chlorobenzyl Mercaptan
Chlorobenzyl Hydroxyethyl Sulfide

PETROLEUM FEEDSTOCK: NAPHTHALENE

Chloronapthol
Ethoxynaphthoyl Chloride
Diethylamino Naphthalene Sulfonyl Chloride

PETROLEUM FEEDSTOCK: PARAFFINS

Chlorinated Unsaturated Paraffins
Chlorinated Saturated Paraffins
Chlorobutanol
Chlorobutyronitrile
Dichloro Dibutyl Ether
Chlorolactic Acid
hlorophenetole

PETROLEUM FEEDSTOCK: BENZENE

Chlorosalicylic Acid
Chlorosalicylaldehyde
Hexachloroparaxylene
Biphenyl, 4,4^{1} - Disulfonyl Chloride
Dimethoxy Benzophenones
Dimethyl Benzophenones
p-Chloromercuriphenol
Alkylbenzene Sulfonic Acids & Salts
Nitrochloroacetanilide
Nitrochloroaniline
Chlorofluoroaniline

0755253

TABLE 2. ADDITIONAL ORGANIC CHEMICAL PRODUCT CLASSES POTENTIALLY CONTAINING INADVERTENTLY GENERATED PCBs NOT SPECIFICALLY LISTED IN TABLE 1 (continued)

PETROLEUM FEEDSTOCK: BENZENE (continued)

Chlorodimethoxy Aniline
Chloro-Hydroxy-Dimethoxy Naphthanilide
Chloro-Hydroxy-Naphth-o-Toluidide
Chlorosalicylanilide
Chlorotoluidide
Diethyl (and) Dimethyl Amino Benzene Diazonium Chloride Salts
Chlorinated Phenyl Isocyanates
Chlororesorcinol
Chlorohydroquinones
Chlorocresol
Chloroxylenol
Chlorobenzophenol
Chloroanisidine
Chloroanisol
Chlorostyrene
Chlorobenzene Sulfonamide
Chlorobenzotriazole
Dichloroaminotriazole
Chlorophenylenediamine
(orophenyldiethanolamine
Dichlorobenzil
Chlorophenyl Acetonitrile
Chlorothymol
Chlorofluorobenzene
Chlorofluoronitrobenzene
Chloroxylene
Trichlorophenoxy Acetic Acid
Chloronitrobenzoic Acid
Chlorobenzene Sulfonic Acid & Esters
Nitrophenyl Sulfonyl Chloride
Dichlorophenyl Acetic Acid
Chlorophenyl Thioacetonitrile
Chlorophenyl Hydroxyethyl Sulfide
Chlorophenyl Chloromethyl Sulfide
Chlorophenyl Chloroethyl Sulfide
Chlorobenzene Thiol

0755254

TABLE 2. ADDITIONAL ORGANIC CHEMICAL PRODUCT CLASSES POTENTIALLY CONTAINING INADVERTENTLY GENERATED PCBs NOT SPECIFICALLY LISTED IN TABLE 1 (continued)

CHLOROSILANES

Phenylchlorosilane
Vinyl Trichlorosilane
Methyl Chlorosilane
Chloromethyl Dimethylchlorosilane
Trimethylchlorosilane
Dichloromethylsilane
Trichloromethylsilane

ALKYL AND ARYL PHOSPHINES AND PHOSPHATES

Methyl Phosphoro Dichloride
Methyl Phosphonic Dichloride
Benzene Phosphorous Dichloride
Benzene Phosphorous Thiochloride
Tri-(B-Chloroethyl) Phosphate
Tri-(Dichloropropyl) Phosphate
Ethyl Phosponothioic Dichloride
Ethyl Phosphorus Dichloride
Methyl Phosphonothioic Dichloride
Diethyl Chlorophosphate
D' hyl Phosphorochloridothioate
Bis-(2-Chloroethyl) Phosphonate
Bis-(2-Chloroethyl) Vinyl Phosphonate

CHLORINATED PIGMENTS/DYES

CHLORINATED PESTICIDES

0755255