



CHEMICAL MANUFACTURERS ASSOCIATION

001 - 51992

October 2, 1992

To: Ethylene Dichloride Panel Members

Re: Update on RM Process at EPA

As requested during the last Panel conference call, I have been communicating with EPA regarding its Risk Management (RM) process on ethylene dichloride. As you know, EPA previously indicated that a stakeholders meeting was to have been held this past summer. According to Linda Moos-Vliers of EPA, that meeting was postponed and has not yet been rescheduled. She told me that the Agency is currently investigating modeling parameters for EDC. In addition, EPA is working with its regional offices in identifying facilities with high levels of EDC releases. Interestingly, Ms. Moos-Vliers reported that the high EDC levels are not associated with the major uses of EDC, but with what EPA has classified as "miscellaneous" users. She suggested that the EDC manufacturers should consider working with EPA to lower these release levels, perhaps by educating EDC users through the manufacturers' product stewardship programs.

You may recall that there was some confusion as to which companies were originally contacted by EPA when the RM process began. I reviewed the administrative record at EPA's docket office which showed that all of the EDC Panel companies were included in the Agency's original communication dated August 13, 1991. However, according to the administrative record, only Vista, Dow, and OxyChem have responded to EPA's letter of concern.

Ms. Moos-Vliers informed me that her division is undergoing a reorganization at this time. When that is complete, I will continue my communications with the appropriate Agency official. If the Panel is interested, I can try to schedule a meeting with EPA to discuss the RM process and to offer the Panel's technical assistance in determining how to respond to the Agency's findings on EDC release levels.

As always, if you have any questions or concerns, please call me at 202-887-1146. Thank you.

Regards,



Kathleen M. Roberts
Manager
Ethylene Dichloride Panel

RM 2 CHEMICAL STATUS SHEET

Chemical Name(s):	1,2-Dichloroethane (Ethylene dichloride, EDC)
CAS #:	107-06-2
Date Status Sheet Prepared:	5/8/92
1st public RM 2 Assessment:	July 1992
Annual Production Volume:	17,042,000,000 pounds
Major Uses:	As chemical feedstock for production of polyvinyl chloride, chlorinated solvents, ethylene amines, vinylidene chloride, as lead scavenger in leaded gas, and numerous miscellaneous uses.
Effects of Concern:	Human health only (Cancer is the major concern, also chronic effects on the liver, lungs, kidneys, and nervous system.)
Exposures of Concern:	General population Occupational Restatement of RM1 concerns with additional review and development.
Major Manufacturers/ Trade Organizations:	Borden Chemicals, Dow Chemicals, Formosa Plastics, Georgia Gulf, BF Goodrich Chemical, Occidental Petroleum, PPG Industries, Vista Chemical, Vulcan Materials / Chemical Manufacturers Association (CMA)
Major User Groups/ Trade Associations:	Ferro Corporation, 3M, Uniroyal, Eastman Kodak, Albright and Wilson, National Starch, Rhone-Poulenc, DuPont, Eli Lilly, AAR Brooks & Perkins / Synthetic Organic Chemical Manufacturers Association (SOCMA)
Other Interested Stakeholders:	EPA Regional Offices, State environmental agencies, OSHA, NIOSH, various environmental groups (eg NRDC, EDF, etc), various labor unions representing chemical workers (eg OCAW, ICWU, USWA etc)

Status of Stakeholders' Dialogue: Letters of Concern sent to 48 companies on August 13, 1991. Eleven responses received. No other meetings or dialogue to date.

Next Steps: Completion of RM2 Assessment and initiation of Stakeholders Dialogue.

Other Comments of Note: None

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