

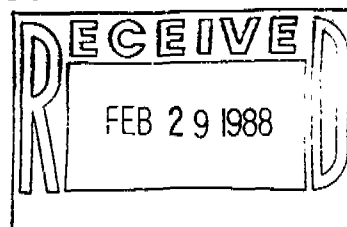


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

18 FEB 1988

Dr. Robert R. Romano
Associate Director, Special Programs
Chemical Manufacturers Association
2501 M Street, N. W.
Washington, D. C. 20037



Dear Dr. Romano:

This is in response to your letter of January 7, 1988, concerning testing for 1,1-Dichloroethylene under the Toxic Substances Control Act, Section 4. The Office of Air Quality Planning and Standards has concluded that testing of 1,1-Dichloroethylene is not warranted at this time based, in part, on the emissions data submitted by the Chemical Manufacturers Association. Although we have not confirmed these emission estimates, they indicate a 75 percent reduction in ambient air emissions since the proposal of the test rule in August 1986. In addition, the industry has publicly accepted the cancer potency estimate based on the single positive bioassay. Using the current emission estimates and the cancer potency estimate, the annual cancer incidence would be reduced significantly from previous estimates. Given the magnitude of the cancer incidence values based both on the unverified industry data as well as the original estimates of the Agency it is unlikely that we would initiate Federal regulatory development efforts on 1,1-dichloroethylene. As a result, we have withdrawn our proposal for the testing of 1,1-dichloroethylene. Should additional information become available in the future, we will reevaluate the need at that time.

We continue to support the efforts of the industry to reduce emissions of 1,1-dichloroethylene and we appreciate your efforts to keep us informed of the progress in this area.

Sincerely,

Nancy B. Pate, D.V.M.
Project Officer
Pollutant Assessment Branch
Emission Standards Division

cc: C. Glasco
R. Northrup
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SPECIAL PROGRAMS DIVISION

From Romano
Ref. No. 2126/88
Date VDC Panel

SL 062050