

TO: Chuck Hoover-Austin

~~TSG: JCL: FEO~~ ~~NO: RF~~
AF: June

FROM: T. G. Grumbles
DATE: August 13, 1991

VISTA

Interoffice
Communication

SUBJ: BROMINATED FLAME RETARDANT TSCA SECTION 4 TEST RULE

The proposed rule, published in the June 25th Federal Register, is issued under Section 4 of TSCA. This section gives the EPA broad authority to require manufacturers and processors of specific substances to test those substances for toxicity or environmental fate and effect testing. Typically, manufacturers of the chemicals will work together to share costs.

This rule is proposing a very broad range of testing. Total costs for the testing proposed are estimated by EPA to be 11.6 to 19.1 million or 100,000 to 500,000 annually for 15 years, depending on the chemical. This is an extraordinary amount of testing to be in a test rule. The actual testing panel and subsequent costs will be negotiated but even if it's cut in half, it's still a lot.

EPA's concern's regarding these substances include developmental toxicity, bioaccumulation potential, potential carcinogenicity, immunosuppression and environmental persistence.

Although this test rule has no direct impact on us in regards to testing obligations, the costs and availability of these materials is certain to be affected. At this time, I'd suggest we ask our potential suppliers what they plan to do in response to the proposed test rule. In the long run, this test rule should cause us to evaluate the desirability of using these materials based on the potential of multiple toxicity and environmental effect questions.

Tom

T. G. Grumbles

dlj

cc: John Kirkpatrick, Dave Penney-Austin

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