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TO: Wendy K. Sherman**FAX NO.:** 703-741-6091**FROM:** Thomas C. Downs**DATE:** December 18, 1997**TOTAL NUMBER OF PAGES (including cover page):** 3

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December __, 1997

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Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Att'n: Section 8(e) Coordinator

Re: Vinyl Chloride (CAS No. 75-01-4)

Dear Sir:

The following information is being submitted by the Vinyl Chloride Panel of the Chemical Manufacturers Association pursuant to guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act. This submission is made on behalf of U.S. manufacturers of vinyl chloride represented on the Panel: Borden, Inc., CONDEA Vista Co., Dow Chemical Co., Formosa Plastics, Geon Co., Georgia Gulf Corp., Occidental Chemicals, PPG Industries, Inc., and Westlake Polymers. Neither the Panel nor any of the member companies has made a determination as to whether a significant risk of injury to health or the environment is actually indicated by the reported findings.

The Panel is sponsoring, pursuant to a Memorandum of Understanding with the Agency for Toxic Substances and Disease Registry (ATSDR), a reproductive and developmental toxicity study of vinyl chloride in CD rats. A draft report on the developmental toxicology portion of the study has been received from Huntingdon Life Sciences. The draft report, which is enclosed, observes that during days 15-20 of gestation, mean body weights for the 75 treated rats were lower than for the 25 rats in the control group. The report

states that because the differences in weight reduction were slight (less than 10% in comparison to control data for rats treated with 100 parts per million (ppm) and 1100 ppm vinyl chloride and 12% for rats treated with 10 ppm vinyl chloride) and not dose-responsive, their toxicological significance, if any, is unclear.

Please do not hesitate to let me know if there is any question about this submission.

Sincerely,

Wendy K. Sherman
Vinyl Chloride Panel