

LCOP w/ATT

TO: Mike Hayes

FROM: T. G. Grumbles

DATE: June 28, 1988

Interoffice
Communication

SUBJ: TSCA SECTION 4 TEST RULE FOR METHYL CHLORIDE

VISTA

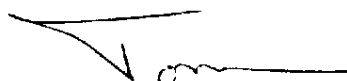
On June 15, EPA finalized a Section 4 test rule for manufacturers and processors of 33 chemicals, including methyl chloride. Specifically, the Agency is requiring hydrolysis testing for methyl chloride and recommending biodegradation testing. The biodegradation testing is optional.

The Methyl Chloride Industry Association (MCIA) will sponsor the required hydrolysis testing if the members, including Vista, wish to proceed as a group. I believe we should, and MCIA will probably end up doing this. The cost will be greatly reduced (by a factor of 5 or 6) if we participate.

Two items are attached. A copy of the final rule and minutes from the last MCIA meeting.

The effective date of the final rule is July 29. We have 30 days after that to notify the Agency of our intent to test. The "meat" of the proposal is on pages 22314 to 23316. Comments made by MCIA when this rule was proposed are on page 22309.

I'll let you know as soon as MCIA makes a decision and gets the estimates on testing costs. Do you have any thoughts or problems with proceeding with MCIA as a group to meet the testing requirements?


T. G. Grumbles

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Attachments

cc w/o att. W. L. McClain
J. F. Lopez
J. A. DeBernardi
T. H. Huffman

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