testing should be tested for neurobehavioral toxicity, "except for those which have been demonstrated to be potent carcinogens." According to the association committee, "Commercial use of potent carcinogens will occur in situations where human exposure would be prevented, hence no neurotoxicity will occur."

The committee noted that the chemicals have "marked potential for neurotoxic effects and may offer an unreasonable risk of injury to health." More testing is needed to characterize these effects, the group added.

E.I. du Pont de Nemours & Co. told the agency that the firm is conducting a survey of phenylenediamine exposure and releases, claiming that the exposure data used by EPA to consider the test rule are inaccurate.

All industry representatives opposed use of either a significant new use rule under Section 5(a) or risk list designation under Section 5(b)(4) of TSCA. According to Dupont, use of both "would have the incongruous result of requiring a manufacturer or 'new' user to prove that a proposed use would not present an unreasonable risk to health or the environment."

Pesticides

EPA SEEKS COMMENTS ON PROPOSAL TO ALLOW UNLABELED USES IN NURSERIES, GREENHOUSES

Commercial nursery and greenhouse operators would be allowed to use pesticides in certain ways not specifically permitted by labeling, under a proposed Environmental Protection Agency policy, which is the subject of an agency request for public comments.

A notice requesting comments was signed May 6 by Edwin L. Johnson, director of the agency's Office of Pesticide Programs. The notice is expected to appear soon in the Federal Register.

The agency notice differs from an earlier draft (Current Report, March 5, p. 1237) primarily in being more noncommittal.

Where the earlier draft would have announced that the agency "is proposing a policy," the final version simply states that "EPA is considering whether to develop a determination" on the issues.

The "proposed policy" and "other options" of the earlier draft are lumped together as "options under consideration," in the final version.

Six Options

According to the notice, the agency is considering the establishment of a new policy, under Section 2(ee) of the Federal Insecticide, Fungicide, and Rodenticide Act. Under the policy, the agency would declare that certain unlabeled uses do not violate the act.

The agency would permit commercial use of registered pesticides under one or more of the following options:

- A pesticide labeled for use on nursery plants could be used to control labeled pests on nursery crops other than food/feed crops, as long as labeled application methods are used.
- A pesticide labeled for use on any greenhouse plants could be used to control labeled pests on all greenhouse crops, except food/feed crops, following labeled application methods.
- A general-use pesticide labeled for food-crop use could be used to control labeled pests on non-food/non-feed crops in commercial nurseries, following labeled application methods.
- Any pesticide registered for food crops could be used to control labeled pests on non-food/non-feed nursery and greenhouse crops, using any application method not prohibited by labeling.
- Registrants of food-use products would be allowed to amend registrations, without submitting additional data or incurring data compensation obligations, to permit use on non-food/non-feed nursery or greenhouse crops in accordance with labeled application methods. Registrants could include label statements declaring that users are responsible for any crop damage resulting from such use.
- Pesticides registered for food uses could be used for non-food/non-feed nursery or greenhouse crops if the use is given "third party certification" by a trade association, extension service agent, or other specialist who would certify that the use will not cause crop damage. Application methods not prohibited by labeling could be used with third-party endorsement.

None of the above options would allow indoor use of products registered only for outdoor uses.

The notice provides for a 60-day comment period, following publication in the Federal Register.

For further information, contact Karen Flagstad, Policy and Special Projects Office (TS-766C), Office of Pesticide Programs, EPA, Room 1109, Crystal Mall Bldg. 2, 1921 Jefferson Davis Highway, Arlington, Va. 22202, (703) 557-7102.

Polychlorinated Biphenyls

ADVERSE HEALTH EFFECTS NOT CERTAIN, SYMPOSIUM TOLD; MEETING CALLED BIASED

Recent studies on the health effects of polychlorinated biphenyls raise questions about the potential hazards of the chemicals without giving very clear or consistent answers, a May 12-13 health effects symposium was told.

About the only consistently reported adverse health effects from PCBs are chloracne and enzyme induction, according to two speakers, William R. Gaffey, Monsanto Co., and consultant Seymour L. Friess, of Drill, Friess, Hays, Loomis and Shaffer Inc. They said other studies reporting more serious effects, including cancer, gave conflicting findings.

But other participants raised questions about the validity of some of the studies that found few, conflicting, or no adverse effects. Small study populations, inadequate follow-up, differences in exposure routes, and too small dosages were suggested as possible factors affecting the study results.

The two-day symposium was sponsored by the Environmental Protection Agency to exchange scientific information on recent health and environmental exposure studies.

Criticism Leveled

It was criticized by the Natural Resources Defense Council for having a pro-industry bias. NRDC attorney Jacqueline Warren May 4 wrote John Todhunter, assistant administrator for pesticides and toxic substances, asking the agency to cancel the symposium.

Warren said most of the people involved in panel discussions at the symposium were either industry members or consultants, and claimed almost none of the speakers had first-hand knowledge of health effects from PCBs.

Warren said NRDC was informed that Todhunter had promised the Chemical Manufacturers Association the symposium would be held "in time to coincide with (and presum-

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ably to influence) the agency's re-write of the PCB ban regulations." Regulations previously excluding certain chemical and electrical equipment from the PCB ban were overturned by the U.S. Court of Appeals for the District of Columbia Circuit in 1980, forcing EPA to re-write them (Current Report, Oct. 31, 1980, p. 906).

Among recent data submitted to help EPA with its re-drafting were PCB studies by industry groups. They included health effects studies, one of which was done by the Drill, Priess consulting firm. Another health effects reviewer who worked for industry as part of the PCB data-gathering effort also spoke at the symposium.

Todhunter wrote back to Warren May 10, saying that EPA would not use the forum to renege on its agreement to draft better PCB rules under the appeals court order. He also encouraged the group to attend the conference, which it did, and said the advance notice of the conference was distributed widely to academic, government, industry, and professional groups to encourage as much participation as possible.

He offered to have an open discussion period added at the end of the symposium during which additional "scientific issues or questions" could be raised from the floor.

The contract for the symposium specified that there was to be no discussion of the regulatory issues before EPA, according to Todhunter's office. Discussion leaders were supposed to redirect any regulatory discussion back to the scientific issues.

'Mixed Bag' Of Results

Gaffey told the symposium that his review of PCB epidemiological studies gave "no reason to believe there is a carcinogenicity problem with PCBs" and "even less" evidence indicating problems other than chloracne and enzyme induction.

Priess said a review of animal teratogenicity studies gave "a real mixed bag" of results. He said three studies on cancer by "major laboratories" gave different results.

One of the problems widely discussed was the difficulty in analyzing the 209 different PCB molecules known to exist. This point was raised in CMA comments on the new rule-making. The association told EPA that detecting the molecules in chemical streams was an expensive proposition because each one had to be created and printed so that its individual pattern later could be identified if it appeared in a chemical process (Sept. 4, 1981, p. 500).

Toxicity Varies

One of the speakers at the symposium, Stephen Safe, Texas A&M University, reported work he had done creating different PCB molecules and then measuring their ability to induce a certain enzyme in laboratory tests. The induction ability, he said, might indicate toxicity.

He explained that the degree of enzyme induction depended on the position of chlorine atoms on the biphenyl molecules, which might explain why some PCBs or Arochlors would give positive toxicity results and others negative results.

He said he had identified four PCB molecules that showed unusually high enzyme induction ability. Two of the four were tetrachlorobiphenyls, one was a pentachlorobiphenyl, and one a hexachlorobiphenyl.

Safe said tests were continuing on actual toxicity, but that existing studies on toxicity generally confirmed that the four he identified were toxic.

He said questions that remain to be answered include whether PCBs are carcinogenic and what effects they give at low levels. Safe said that the most active of his PCBs was about four times less active than dioxin.

Reporting

27 TSCA CHEMICAL INVENTORY LISTINGS MAY BE REMOVED DUE TO ERRORS, NEW ANALYSIS

The Toxic Substances Control Act chemical inventory would be 27 listings shorter under an Environmental Protection Agency notice of intent to remove the substances on the basis that they were incorrectly reported.

According to a May 13 announcement (47 FR 20663), the agency is seeking comments on plans to remove from the inventory 27 listings that were the subjects of reporting, typographical, or transcriptional errors. The mistakes also may have stemmed from chemical name changes due to "improved analytical equipment and methods" of description, the agency said.

EPA asked for information on whether any of the chemicals in the list have been manufactured or imported since the beginning of 1975, whether the chemicals have been correctly reported, or whether the chemicals should remain on the inventory for any other reason.

Manufacture of any of the chemicals begun before the notice was published may continue until publication of a final notice, according to the agency. However, the chemicals will not be retained on the inventory solely on the basis of manufacture, importation, or processing.

The chemicals are:

- 65066-37-5 Nonanoic acid, 2,2-dimethyl-, oxiranylmethyl ester, polymer with ethenylbenzene, 2-hydroxyethyl 2-propenoate, 1,3-isobenzofurandione and methyl 2-methyl-2-propenoate.
- 65121-76-8 Phenol, 2-methyl-4,6-dinitro-, lead (2+) salt.
- 65122-05-6 Diazene, [(1,3-dihydro-1,1,3-trimethyl-2H-iden-2-ylidene)methyl][2-methoxyphenyl]-.
- 65151-58-5 Decannoic acid, 1,3,5,-triazine-2,4,6-triyltris[(methoxymethyl)imino]methylene ester.
- 65530-81-6 Poly(difluoromethylene), α-(2,2-dichloro-1,1,2-trifluoroethyl)-Ω-hydro-.
- 65717-13-7 4-Pirimidinecarbexylic acid, 1,2,3,6-tetrahydro-5-nitro-2,6-dioxo-, monopotassium salt.
- 67892-76-6 Nonanoic acid, 2,2-dimethyl-, oxiranylmethyl ester, polymer with butyl 2-propenoate, methyl 2-methyl-2-propenoate and 2-propenoic acid.
- 67892-78-8 Nonanoic acid, 2,2-dimethyl-, oxiranylmethyl ester, polymer with butyl 2-propenoate, ethenylbenzene, 2-hydroxyethyl 2-propenoate and 2-propenoic acid.
- 68110-21-4 Zincate(1-), trichloro-, hydrogen, compd. with N,N-diethyl-4-[(1-methyl-1H-1,2,4-triazol-5-yl)azo] benzenamine (1:1).
- 68213-42-4 Fatty acids, tall-oil, polymers with bisphenol A, bisphenol A diglycidyl ether, Bu acrylate, 2-(dimethylamino)ethyl methacrylate, 2-[(1,1-dimethyl) amino]ethyl methacrylate, glycidyl 2,2-dimethylnonanoate, hydroxyethyl methacrylate and Me methacrylate.
- 71002-22-8 1,1'-Bi-1H-indanone, 2,2',5,5'-tetrakis(2-chlorophenyl)-4,4',bis(3,4-dimethoxyphenyl)-.
- 71735-70-1 B-Alanine, N-[3-(acetyloxy)propyl]-.
- 71799-76-3 9,11-Octadecadienoic acid, (Z,E)-, polymer with 2-hydroxyethyl 2-methyl-2-propenoate, methyl 2-methyl-2-propenoate, (Z,E)-9,12-octadecadienoic acid and octanoylmethyl 2,2-dimethylnonanoate.
- 74390-77-9 Benzenediazonium, 3-methoxy-3-methyl-4-[(3-sulfophenyl)azo]-, chloride.
- 74642-98-1 Cuprate(2-),[bis(aminosulfosyl)-29H,31H-

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