

OCT 29 1985

FILE-VDCM

TO: L.W. Keller
FROM: Zeb G. Bell, Jr.
DATE: October 7, 1986
SUBJECT: VDC TSCA (4)(a) Testing

JAB
JAKL

Z.G. Bell

who attended 10/28!

mail 4/10/86

This is to advise you that the CMA VDC Program Panel has retained the services of R. Bruce Dickson to assist in the preparation of comments on the proposed test rule, F.R. 28840 (August 12, 1986). The thrust is that the testing is not necessary, the agency records do not show the presence of an unreasonable risk, and the data base on VDC is reasonable to conclude there is no risk to humans.

The users will not be required to do the testing unless the manufacturers fail to conduct testing. There have been meetings on this subject in Detroit, Washington, DC, and another is scheduled for October 8 at 1:00 p.m. Dow Chemical is taking the lead and PPG is the only other producer of VDC. A public hearing is scheduled for October 28, 1986 and CMA/Dow/PPG are expected to have a presentation along the lines mentioned above. You are welcome to attend and participate in the critique of the EPA proposed test rule and of the 18 chronic studies under review.

who?!

I'm Chairman of the CMA VDC Program Panel. I think it is under control as well as can be expected. We can use all the help we can get.

Zeb G. Bell, Jr.
Zeb G. Bell, Jr., Director
Health Administration and Toxicology

ZGB/p

cc H.E. Gilbert
C.P. Blahous
W.B. Graybill
J.A. Barter

RECEIVED
OCT 8 1986
Environmental Affairs

Wai

The Oct 28th meeting was set before the 90-day extension was approved, therefore, it was not held to my knowledge. we did get the 90 days!

ZGB

10/29/86

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