

April __, 1997

Ms. Kim E. Jenkins
Division of Toxicology
Agency for Toxic Substances and Disease Registry
Mailstop E-29
1600 Clifton Road, N.E.
Atlanta, Georgia 30333

Re: Vinyl Chloride Toxicological Profile

Dear Ms. Jenkins:

On behalf of the CMA Vinyl Chloride ^{Health Committee} ~~Panel~~, I am writing to bring to the attention of the Agency for Toxic Substances and Disease Registry (ATSDR) a number of corrections that should be made in the next update of the Toxicological Profile for Vinyl Chloride. These corrections account for changes in corporate ownership and/or operation of certain facilities identified as manufacturers or processors of vinyl chloride, and provide clarification of the estimated range of maximum amounts of vinyl chloride present at certain facilities. The corrections apply to Part 4, Production, Import Use, and Disposal, and mainly involve Table 4-1:

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Second Paragraph, fifth line.

<Insert #2>

- ^{CONDEA} Vista Chemical Company is located in West Lake, Louisiana (not Lake Charles), ^{last name change} Aberdeen, Mississippi and in Oklahoma City, Oklahoma.
- The BF Goodrich facility in LaPorte, Texas, is now owned by Geon Company. Geon purchased this and certain other BF Goodrich facilities in April 1993.
- The statement that 10 companies produce VCM at 12 facilities should be updated.

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<INSERT #1>

pg 137 First paragraph, second line

- Vinyl chloride monomer production is said to increase 22%, however, the time span over which this increase occurred is not ~~mentioned~~ ^{stated}

<INSERT #2>

- There are a variety of inconsistencies between the list of VCM producers in the second paragraph of the text and those listed as producers in Table 4.1. For example, Oxymer in Ingelside, TX is listed as a producer in the text but does not appear in Table 4.1. Conversely, Vulcan Materials Co. of Geismar, LA is listed in Table 4.1, but not in the introductory text.

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- p. 138
- Table 4-1. On the fourth line, the Georgia Gulf Corp. facility in Delaware City, DE ~~should be deleted~~ *is now owned by Keneba Delaware Corp.*
 - BF Goodrich facilities identified on the seventh line (Henry, IL) and ninth line (Louisville, KY) are now Geon Company facilities. The Panel is informed, however, that BF Goodrich continues to operate a latex manufacturing plant at the Louisville site, which reportedly uses some vinyl chloride.

For the Borden facility in Geismar, LA the entry in the "Range Column" should be changed from no data to 1,000,000 to 9,999,999

For the Geon facility located in Henry, IL (identified on the seventh line), under the "activities and uses" column, as a product component" should be deleted; vinyl chloride is used only as a reactant at this facility.

The entry for the Borden facility in the "Range of maximum amounts on site in pounds" column (hereinafter "Range Column") for the Borden, Illinois, IL plant should be 1,000,000 - 9,999,999 instead of no data.

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On the fourth line from the bottom, the name of Viste Chemical should be changed to CONDEA Viste Company, and the Range column should read 1,000,000 - 20,000,000

The "Range Column" for the Georgia Gulf Plaquemine, LA facility should read 30,000,000

Table 4-1 (cont'd). The facility identified on the first line, BF Goodrich of Plaquemine, LA (which changed to Geon Company ownership in April 1982) should be deleted. Vinyl chloride-related activity ceased at this facility in June 1992, prior to its sale to Geon, and no vinyl chloride-related manufacturing or processing has taken place since then.

The entry on the fifth line should be ~~deleted~~ or revised. The Addis, LA facility identified as Occidental Chemical Corp. was sold to Borden Chemicals and Plastics. The other information remains the same.

On the tenth line, BF Goodrich of Pedrickton, NJ should be changed to Geon Company.

On the 13th line, BF Goodrich Avon Lake should be changed to Geon Company, and the entry in the column entitled "~~Range of maximum amounts on site in pounds~~" (hereinafter "Range column") for this facility should read "100,000-999,999." The current operation at the Geon facility at Avon Lake, OH, is limited to pilot plant or developmental activities. The primary vinyl chloride-related activity was discontinued prior to the acquisition by Geon.

On the eighth line, Viste Chemical has changed its name to CONDEA Viste Company, and the Range Column should read 1,000,000 to 9,999,999 instead of "no data."

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(cont'd)

However, BF Goodrich reportedly still operates a small pilot plant at the site where it uses some vinyl chloride.

- Under the Range column for Formosa Plastics Corp. (fifth row from the bottom), replace "No Data" with "1,000,000-9,999,999."

On the 14th line, replace the name for VCI Chemical with the name for CONCEPT Chemical Company.

The first entry on page 3 of Table 4-1 is the entry Occidental Chemical, La Porte, TX. The entry on the second to the last row should be deleted. Occidental does not own a facility in La Porte, TX.

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- Table 4-1 (cont'd). *On the first row, for Occidental Chemical of Pasadena, TX, "100,000-999,999" should be listed in the Range column instead of no data.*
- BF Goodrich of Deer Park, TX, ~~the second entry~~, should be changed to Geon Company.
- ~~The third entry~~, Occidental Chemical Corp. of Deer Park, TX should be deleted. Occidental does not conduct activities involving vinyl chloride at the facility.
- ~~The fifth entry~~, Occidental Chemical of Gregory, TX should state "100,000-999,999" in the Range column.

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- Under "5.2.1 Air," fifth line, it is noted that 1992 TRI data are used to estimate the total amount of vinyl chloride released into the air. More recent data are available, and would provide a more accurate estimate.

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- At section 5.6, the title "POPULATIONS WITH POTENTIALLY HIGH EXPOSURES" should read "POPULATIONS WITH POTENTIAL EXPOSURES." Use of the term "high" may wrongly suggest that exposure levels for the populations identified are above effect levels.

A revised version of Table 4-1, reflecting these changes, is enclosed.

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Committee
The ~~Panel~~ recommends that ATSDR change the format of Table 4-1 to provide information more useful than the wide ranges shown as "maximum amounts on site in pounds." While the ~~Panel~~ *Committee* not have access to any specific storage data, we would be pleased to provide the nameplate capacity of each of these facilities if ATSDR would present this information in lieu of the ranges.

Committee If you would like more detailed information on any of the corrections the ~~Panel~~ recommends, please do not hesitate to call me at (703) 741-5637. Thank you for your consideration. 9

Very truly yours,

~~Hasmukh C. Shah, Ph.D.~~ *Wendy K. Sherman*
Manager
Vinyl Chloride ~~Panel~~
^
Health Committee

CMA 112929

Table 4-1. Facilities That Manufacture or Process Vinyl Chloride

Facility	Location ^a	Range of maximum amounts on site in pounds	Activities and uses
KEYSOR-CENTURY CORP.	SAUGUS, CA	1,000,000 - 9,999,999	As a reactant
UNION CARBIDE CORP.	TORRANCE, CA	10,000 - 99,999	As a reactant
FORMOSA PLASTICS CORP.	DELAWARE CITY, DE	1,000,000 - 9,999,999	As a reactant
GEORGIA GULF CORP.	STET DELAWARE CITY, DE	1,000,000 - 9,999,999	As a reactant
WESTLAKE PVC CORP.	PACE, FL	1,000,000 - 9,999,999	As a reactant
UNION CARBIDE CHEMICALS	TUCKER, GA	100,000 - 999,999	As a reactant
GEON CO. BE GOODRICH CO.	HENRY, IL	1,000,000 - 9,999,999	As a reactant; As a product component
BORDEN CHEMICALS & PLASTICS	ILLIOPOLIS, IL	1,000,000 - 9,999,999 No Data ^b	As a reactant
GEON CO. BE GOODRICH CO.	LOUISVILLE, KY	1,000,000 - 9,999,999	As a reactant
AIR PRODS. & CHEMICALS INC.	CALVERT CITY, KY	10,000 - 99,999	As a reactant
WESTLAKE PVC CORP.	CALVERT CITY, KY	1,000,000 - 9,999,999	As a reactant
WESTLAKE MONOMERS CORP.	CALVERT CITY, KY	1,000,000 - 9,999,999	Produce; For sale/distribution
VULCAN MATERIALS CO.	GEISMAR, LA	100,000 - 999,999	Produce; For on-site use/processing; As a by-product; As a reactant
BORDEN CHEMICALS & PLASTICS	GEISMAR, LA	1,000,000 - 9,999,999 No Data ^c	Produce; For on-site use/processing; For sale/distribution; As a reactant
PPG IND. INC.	LAKE CHARLES, LA	No Data	Produce; For sale/distribution; As a by-product; As an impurity; As a reactant
CERTAINTED CORP.	SULPHUR, LA	1,000,000 - 9,999,999	As a reactant
INDELVISTA CHEMICAL CO.	WESTLAKE, LA	10,000,000 - 99,999,999 No Data ^c	Produce; For sale/distribution
FORMOSA PLASTICS CORP.	BATON ROUGE, LA	1,000,000 - 9,999,999	Produce; For on-site use/processing; For sale/distribution; As a by-product; As a reactant
RHONE-POULENC BASIC CHEMICALS	BATON ROUGE, LA	10,000 - 99,999	Ancillary uses
DOW CHEMICAL CO.	PLAQUEMINE, LA	No Data	Produce; For sale/distribution; As a reactant; As a manufacturing aid; Ancillary uses

Kennika
Delaware
Corp. →

Table 4-1. Facilities That Manufacture or Process Vinyl Chloride (continued)

Facility	Location*	Range of maximum amounts on site in pounds	Activities and uses
BF GOODRICH CO.	PLAQUEMINE, LA	100,000 - 999,999	As a reactant
GEORGIA GULF CORP.	PLAQUEMINE, LA	10,000,000 - 29,999,999 No Data	Produce; For on-site use/processing; For sale/distribution; As a reactant
Borden Chemicals Plastics → UNION CARBIDE CORP.	HAHNVILLE, LA	No Data	As a by-product
MARINE SHALE PROCESSORS INC.	AMELIA, LA	1,000 - 9,999	As a reactant
OCCIDENTAL CHEMICAL CORP.	ADDIS, LA STET	STET 100,000 - 999,999	As a reactant STET
DOW CHEMICAL USA	MIDLAND, MI	100,000 - 999,999	As a reactant; Ancillary uses
MILES INC.	KANSAS CITY, MO	100,000 - 999,999	As a reactant
VISTA CHEMICAL CO.	ABERDEEN, MS	1,000,000 - 9,999,999 No Data	As a reactant
OCCIDENTAL CHEMICAL CORP.	BURLINGTON, NJ	1,000,000 - 9,999,999	As a reactant
BF GOODRICH CO.	PEDRICKTOWN, NJ	1,000,000 - 9,999,999	As a reactant
GOODYEAR TIRE & RUBBER CO.	NIAGARA FALLS, NY	100,000 - 999,999	As a reactant
VYGEN CORP.	ASHTABULA, OH	1,000,000 - 9,999,999	As a reactant
GEON CO. BF GOODRICH AVON LAKE	AVON LAKE, OH	100,000 - 999,999 1,000,000 - 9,999,999	As a reactant
VISTA CHEMICAL CO.	OKLAHOMA CITY, OK	1,000,000 - 9,999,999	As a reactant
OCCIDENTAL CHEMICAL CORP.	POTTSTOWN, PA	1,000,000 - 9,999,999	As a reactant
GREENWOOD PLATING	GREENWOOD, SC	1,000,000 - 9,999,999	As a product component
DOW CHEMICAL CO.	FREEPORT, TX	No Data	Produce; As a by-product; As an impurity; As a reactant; As a chemical processing aid
SHINTECH INC.	FREEPORT, TX	No Data	Import; For on-site use/processing; As a reactant
FORMOSA PLASTICS CORP.	POINT COMFORT, TX	1,000,000 - 9,999,999 No Data	Produce; For on-site use/processing; As a by-product; As a reactant
UNION CARBIDE CHEMICALS &	GARLAND, TX	100,000 - 999,999	As a reactant
UNION CARBIDE CHEMICALS	TEXAS CITY, TX	1,000,000 - 9,999,999	As a reactant

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* Caffey - a mistake in your table.

Table 4-1. Facilities That Manufacture or Process Vinyl Chloride (continued)

Facility	Location ^a	Range of maximum amounts on site in pounds	Activities and uses
OCCIDENTAL CHEMICAL CORP.	LA PORTE, TX	1,000,000 - 9,999,999	Ancillary uses
RHONE-POULENC BASIC CHEMICALS	HOUSTON, TX	10,000 - 99,999	Ancillary uses
OCCIDENTAL CHEMICAL CORP.	PASADENA, TX	100,000 - 999,999	As a reactant
		No Data	
GEON CO. BF GOODRICH CO.	DEER PARK, TX	1,000,000 - 9,999,999	As a reactant
OCCIDENTAL CHEMICAL CORP.	DEER PARK, TX	No Data	Produce; For sale/distribution
GEON CO.	LA PORTE, TX	No Data	Produce; For sale/distribution
OCCIDENTAL CHEMICAL CORP.	GREGORY, TX	100,000 - 999,999	Produce; For sale/distribution
		No Data	
BONDCOTE CORP.	PULASKI, VA	100,000 - 99,999	As a formulation component

Source: TRI92 1994

^a Post office state abbreviation used