



CHEMICAL MANUFACTURERS ASSOCIATION

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR

January 29, 1997

Tonya Turner
Office of Environmental Health Hazard Assessment
California Environmental Protection Agency
Chronic RELs
301 Capitol Mall, 2nd Floor, Rm. 205
Sacramento, CA 95814-4327
Fax: (916) 327-1097

Re: Proposed Vinyl Chloride Chronic Reference Exposure Levels

Dear Ms. Turner:

The Chemical Manufacturers Association Vinyl Chloride Health Committee (the Committee)¹ submits these comments in response to the Notice of Public Comment by the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHHA) regarding the *Air Toxics "Hot Spots" Guidelines Part II: Technical Support Document for Determining Chronic Reference Exposure Levels*. The members of the Committee have reviewed the OEHHA draft inhalation and oral chronic Reference Exposure Level (REL) for vinyl chloride. The Committee wishes to make OEHHA aware of current activity related to vinyl chloride undertaken by the US Environmental Protection Agency (US EPA) and by independent scientists through the Committee's sponsorship pursuant to a Memorandum of Understanding (MOU) with the Agency for Toxic Substances and Disease Registry (ATSDR). The Committee believes that these developments merit OEHHA's careful examination prior to issuance of any final REL.

Since April 1996, the US EPA has undertaken a pilot program to produce new or updated health assessments and Integrated Risk Information System (IRIS) entries for eleven priority substances, including vinyl chloride. See 61 *Fed. Reg.* 14570 (April 2, 1996). The pilot program is intended to develop or update all non-cancer and cancer information for vinyl chloride and the other pilot chemicals. During a recent telephone conference with the US EPA pilot project manager for vinyl chloride, Bill Pepelko, the Committee learned that US EPA is in the final stages of establishing a database on vinyl chloride and that the updated IRIS file will soon be available to the public. The Committee urges OEHHA to review the updated IRIS database on vinyl chloride prior to finalizing any chronic REL. The Committee believes that a

¹ The members of the Chemical Manufacturers Association Vinyl Chloride Health Committee are: Borden Chemicals and Plastics, CONDEA Vista Company, The Dow Chemical Company, Formosa Plastics, The GEON Company, Georgia Gulf Corporation, PPG Industries, and Occidental Chemical Corporation.



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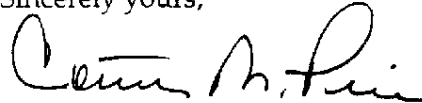
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database on vinyl chloride prior to finalizing any chronic REL. The Committee believes that a failure by OEHHA to consider the updated IRIS information could cause significant discrepancies between the California OEHHA and US EPA approaches, resulting in inconsistent regulatory policies. The contact number for Mr. Pepelko at US EPA is (202) 260-5904.

The Committee also wishes to inform OEHHA of a vinyl chloride study which the Committee is currently sponsoring pursuant to a MOU with ATSDR. The objectives of the study, entitled "Vinyl Chloride Combined Inhalation Two-Generation Reproduction and Developmental Toxicity Study in CD Rats," are to evaluate the effects of vinyl chloride exposures on parental toxicity, reproductive capability, *in utero* development, and neonatal growth and survival in rats. The study involves two phases, a Developmental Toxicity Study phase and a Reproduction Study phase. The final report of the Developmental Toxicity Study is nearly complete and will soon be transmitted to ATSDR. When the Developmental study is complete, we will forward a copy to your office. When the Reproduction Study is completed later this year we will provide you with a copy of that final report as well.

If you have questions or require additional information, please contact Wendy Sherman of my staff at 703/741-5639.

Sincerely yours,



Courtney M. Price
Vice President, CHEMSTAR

cc: Vinyl Chloride Health Committee
Paul Kronenberg, Chemical Industry Council of California