

SIC reporting TRI emissions, largest air emitter (568,763 lb) / total air emission (7,707,055 lb); largest sector for TRI emissions - Chemicals at 33.5% of TRI emissions (2,995,871 lb); EPA Mobile Source Rule data (1996) indicates 76% of total air emissions are from Mobil Sources (e.g. automobiles) and only 0.5% of Total Air Emissions are from the Chemicals TRI emissions.

* Ethylbenzene -- 1,625 facilities reporting TRI emissions in 1998, over 12 SIC reporting TRI emissions, largest air emitter (297,000 lb) / total air emission (8,499,147 lb); largest sector for TRI emissions - Transportation Equipment at 37% of TRI emissions (31,77,374 lb); EPA Mobile Source Rule data (1996) indicates 84% of total air emissions are from Mobil Sources (e.g. automobiles) and only 0.5% of Total Air Emissions are from the Chemicals + Plastics TRI emissions.

* Toluene -- 3,799 facilities reporting TRI emissions in 1998, over 12 SIC reporting TRI emissions, largest air emitter (3,016,064 lb) / total air emission (98,249,634 lb); largest sector for TRI emissions - Printing at 18.5 % of TRI emissions (18,147,921 lb); EPA Mobile Source Rule data indicates 74% of total air emissions are from Mobil Sources (e.g. automobiles) and only 0.7% of Total Air Emissions are from the Chemicals TRI emissions.

The SGA example had a tiny number of applications/uses compared to many other VCCPE chemicals. Thus the complexity and uncertainties are likely to increase for these other chemicals.

Although the case study needs to be a simplified example to be comprehended, we need to stress that this is not likely to be the case for many of the other VCCPE chemicals. The ability to collect data into bins for assessment will be critical. If EPA insists on a bottom-up approach by facility, the process will be extremely burdensome without adding much, if any, real value to the assessment.

We need acceptance that the EPA case study models are not the only approach!
The ACC framework approach is helpful in establishing this position.

Comments regarding the Case Study
p.20 -- Physiochemical Properties ...

* It isn't clear to me why a fast biodegradation rate in water is highlighted as important for characterizing environmental exposure to children.

Table 1 indicates that air emissions are 44x the water emissions from production sites; air emission are ~ 19x the water emissions from use sites; household cleaners are ~23% of the use volume.

* Seems like the low vapor pressure combined with the degradation rates in air, water, and soil are equally important.

p.31 -- Screening Level Risk Characterization

* 1st paragraph -- "For SGA the inhalation RfC is 1 mg/m3, which is 500 times higher than the estimated exposure of 2 ug/m3 from the Whoville plant."

The RfC is referenced on p.18 - Hazard Assessment for Case Study as 1 mg/m3.