

TO: Distribution

~~TGG~~: JCL: ~~EDS~~: ~~MLA~~: AJO: RF

FROM: T. G. Grumbles
DATE: February 15, 1990

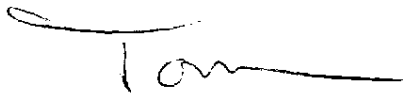
XF: 589

Interoffice
Communication

SUBJ: FUTURE TOXICOLOGY TESTING NEEDS FOR ALFOL 12 AND ALFOL 18

VISTA

Attached is an article regarding an OECD program to obtain toxicity data on multiple "widely produced" chemicals. It is difficult at this time to predict the impact of having a product on the list, but ultimately we could be asked for any unpublished data we have and potentially, industry may be asked to share in additional testing costs. There is always the potential for adverse reaction to our products being on another "suspect list". I'll work with Dave Penny to stay updated on this effort.



T. G. Grumbles

dlj
.1004

Attachment

Distribution: D. Penny, Carl Kerfoot, M. Sweet, R. Swantkowski, J. Friend, J. A. DeBernardi

VVV 000011111

OECD MOVES TO FILL RISK DATA GAP

No published data on health and environment risks exists for well over 100 of the most widely produced chemicals. Concern that the void could conceal some nasty surprises has spurred ever-greener governments of the major Western industrialized countries to launch an international data-gathering program. The effort, announced last November (*CW*, Nov. 22, 1989, p. 32), is being supervised by the Organization for Economic Cooperation and Development (OECD; Paris).

At a mid-January meeting in London, the finishing touches were put on the testing protocols. The program is now in launch phase, and OECD hopes to complete the investigation by the end of 1993.

The testing program will consist of two parts. An initial group of about 50 of the chemicals will be divided among OECD's 27 member countries, with the U.S., West Germany, and Japan expected to take about 10 each. The process of dividing the labor should be completed by April, says Alan Smith, of OECD's chemicals program. The authorities in each country will then approach chemical companies—in principle, the biggest makers of each product—to determine whether they hold relevant data.

If the data is not available from the producers, screening tests paid for by the companies will be carried out covering toxicity, mutagenicity, impact on reproduction, and ecotoxicity. The program will widen to cover the full list of 147 chemicals—mostly organic intermediates (*see table*)—for which published data on health and environment risks does not exist.

Regulatory agencies have no doubts about the usefulness of the program. The products in question are all made in quantities of more than 1,000 m.t./year in at least two OECD member countries. In many cases—for example, that of silicones-precursor chlorotrimethylsilane, or hydrocarbons like pentane and butene—output far exceeds that amount. Although most chemicals listed currently do not appear to be a problem, "in view of the [production] volumes it is prudent to develop this level of information," says Charles Auer, acting director of the

existing chemicals assessment division in the Environmental Protection Agency's Office of Toxic Substances.

The data will make it possible to better protect workers and evaluate risks from releases and wastes, Auer says. How much further the products will be investigated beyond the screening will depend on the results of the screening and potential exposure levels, he says.

The launch of an internationally coordinated, cooperative program is generally welcomed by industry. To date, there has been "a lot of overlap and not a lot of coordination" on the various testing programs under way in the U.S. and various European countries, says Ian Carney, safety and environment manager/continental Europe for ICI (London). Faced with a plethora of information requirements from various agencies, scarce testing resources, and tests costing \$300,000-\$700,000 per chemical, "it's sensible to pull it all together," Carney believes. And OECD's work establishing an internationally accepted screening procedure should help set priorities in other testing programs, such as some Superfund Title 1 requirements, says Joe Le Beau, director/health and environmental sciences with Dow Chemical (Midland, MI).

The West German chemical industry is counting on the international program to help along the major screening of existing chemicals the German government has pushed it to undertake since 1986. "We hope to use data from the OECD program in Germany too," says Ian Meerkamp Van Embden, deputy manager/environmental affairs and technology department with Verband der Chemischen Industrie (Frankfurt), the German chemical industry association. VCI has been working to ensure the tests will be internationally compatible. The U.S. has a long-standing testing program coordinated by EPA's Office of Toxic Substances. The screening approach of the OECD program is seen as complementary to the in-depth investigations usually undertaken in the U.S., EPA's Auer says.

Industry sources are optimistic that the gaps in the data are not as large as they seem and that they do not show neglect. "Many of these are high-volume products, because they are highly reactive intermediates, in the

SUSPECT UNTIL PROVEN INNOCENT: 24 CHEMICALS OECD WILL INVESTIGATE

pipes, going to another molecule," says Dow's Le Beau. "If you look at that next-step molecule, it has been tested." Industry has voluntarily undertaken testing on some products, like isocyanates and chlorinated solvents, where it saw lack of data, says ICI's Carney.

And so far, OECD has only looked for published data, says Gerrity Baker, director/international affairs with the Chemical Manufacturers' Association (Washington). Experience in the U.S. with testing programs has shown that where an investigation has been launched, producers usually have existing data to bring forward. Launch of the OECD programs makes it easier for companies to overcome their own confidentiality concerns with data, much of which shows negative results anyway, adds Michael Viney, an environment affairs specialist with Shell International Chemical (London). OECD officials note that manufacturers of named products hastily offered information, apparently hoping the products would be delisted.

The main concern voiced by European companies on OECD's program is that it will be duplicated by the mandatory existing chemicals testing program the European Commission plans. "We'd like to see the EC recognize [publicly] that the OECD program is there," says ICI's Carney.

DAVID HUNTER

Interoffice
Communication

TO: Distribution (Attendees)

FROM: T. G. Grumbles
DATE: February 15, 1990

SUBJ: OT MEETING AGENDA FOR FEBRUARY 20

TGG: ~~40L~~ ~~ERT~~ ~~MLH~~ AJO: RF

XF: None

VISTA

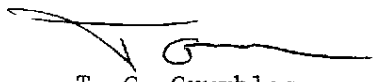
AGENDA - OT MEETING

DATE: 2/20/90

TIME: 3-4:30

ATTENDEES: JAD, THH, RDG, HWH, TGG, BRBM

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| 1. Review Action Items | TGG 5 min |
| 2. Recognition | ALL 10 min |
| 3. Communication | ALL 10 min |
| 4. Review Wall Charts | ALL 5 min |
| 5. Review OT Member Q-Scorecards | ALL 30 min |
| 6. Select Employee Development
Process Element To Work On | ALL 25 min |
| 7. Review Action Items | BRBM 5 min |


T. G. Grumbles

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