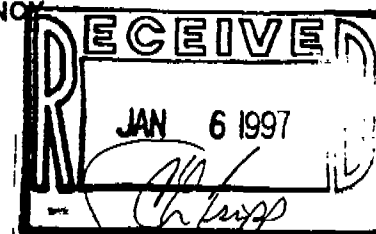




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 20 1996



OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

US SIDS Contact Points:

As you are aware, the US and other OECD Member Countries are currently working to identify the High Production Volume (HPV) chemicals which will be handled in Phase 6 of the Screening Information Data Set (SIDS) program. A letter dated September 25, 1996, sent to US contacts describing the selection process and asking US companies to consider voluntarily sponsoring chemicals noted the fact that the US was behind in meeting its SIDS commitment. I appreciate the efforts by the Chemical Manufacturers Association (CMA) over the past several months to increase industry's awareness of and support for the voluntary SIDS program and look forward to the continued development of CMA's efforts. The current status is that I have received informal commitments on a number of chemicals (~9) with the likelihood of additional commitments on a few more chemicals before the end of 1996 or in early 1997. However, based on the response to date, I am concerned that the US will fall short of its Phase 6 commitment.

As discussed in my earlier letter, EPA started taking a more active role by recommending candidate chemicals for sponsorship by industry. Because of the progress to date in developing US chemicals for Phase 6, EPA has decided to further increase its involvement in the SIDS process. Attached to this letter is a set of chemicals that EPA has identified for US sponsorship in Phase 6. Several of these chemicals have been identified for sponsorship by US companies and these cases will be handled via the traditional US process of industry preparing the dossier and conducting needed testing while EPA serves in a review role. Other chemicals on the list have been selected by EPA without an expression of industry interest. EPA continues to believe that voluntary cooperation between government and industry provides the best basis for US SIDS work to proceed. In that spirit, I invite US companies willing to assume responsibility for any of the unsponsored chemicals (or other chemicals) to identify themselves to me in writing by February 1, 1997.

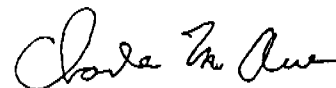
If additional sponsorships are not forthcoming, EPA will commence information gathering and dossier preparation for these unsponsored chemicals using government resources. Outstanding SIDS testing needs identified through this process will be communicated to industry. Any testing needs which cannot be met through voluntary testing will be included in a TSCA §4 SIDS test rule which the Agency plans to begin developing. Once a completed set of SIDS data is available on a chemical, the SIDS Initial

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Assessment Report (SIAR) will be prepared (either by industry or EPA, as needed) and circulated for review nationally and internationally, followed by discussion of the case at an OECD SIDS Initial Assessment Meeting (SIAM), and referral of the final assessment to the RMI process.

While the voluntary SIDS efforts by US companies have been adequate to carry us to this point, I have significant doubts that a sufficient amount of this important testing and assessment work will be undertaken and completed via continued reliance on a purely voluntary scheme. I regret that I must take the steps outlined above. I view the test rule-based approach as a complement to the voluntary approach which can broaden the base of US industry involvement in the SIDS effort and ensure the long term sustainability of the SIDS program in the US. Thus, I continue to encourage companies to voluntarily assume responsibility for handling SIDS chemicals and I trust that this more active EPA role will not cause a fundamental shift in the positive working relationship which exists between government and industry under the SIDS program.

Sincerely,



Charles M. Auer
Director
Chemical Control Division

cc: L. Goldman
W. Sanders
J. Carra

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