



CHEMICAL MANUFACTURERS ASSOCIATION **RECEIVED**

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January 27, 1983

Environmental Affairs

TO: Vinylidene Chloride Program Panel

Subject: I. Vinylidene Chloride (VDC) Program Update and Review of
Pending Action on VDC Health Assessment Document
II. Approval of Transfer of Funds for Future Panel
Operations

Dear Panel Member:

This letter will address the two subjects listed above. In addition, it will update the recommended course of action presented in my letter to you dated October 7, 1982.

I. Vinylidene Chloride Program Update and Review of Pending
Action on VDC Health Assessment Document (HAD)

In an effort to buy the Panel as much lead-time as possible prior to the date on which the clock starts running on the Public Comment Period for the VDC/HAD the writer has been working with members of EPA's Environmental Criteria and Assessment Office (EPA/ECAO). The foregoing is especially important in view of the fact that two of our member companies are located in Tokyo. According to EPA's current projection, we could have less than 40 days in which to submit our comments.

Apropos of the later point, EPA/ECAO recommends that a special letter-petition be addressed to EPA (Dr. Elizabeth Anderson's office) that requests an extension of time for Public Comment. Appropriate action will be taken on this recommendation. This course of action now appears quite advisable in view of the recent decision given to me by EPA/ECAO whereby no preliminary drafts of the VDC/HAD will be issued. This decision was in response to action I initiated over two months ago in an effort to secure a preliminary draft of the HAD.

During a recent discussion, the Panel Chairman, Dr. Zeb G. Bell, suggested that Panel members give consideration to the following action plan that updates the proposed action outlined in my October 7, 1982, letter:

- 1.0 The Program Administrator completed arrangements to secure by Express Mail a copy of the External Review Draft (ERD) of the VDC/HAD. Upon receipt it will be mailed immediately to all Panel members.

- 2.0 After each Panel member has about a week to review the ERD/HAD, a conference call will be scheduled during which an action plan will be discussed. You will be informed of the exact date and time of the conference call.
- 3.0 If necessary, as work progresses on the action plan, a meeting of the full Panel might prove advisable. If so, it will be scheduled.
- 4.0 Again, Dr. Bell requests comments and recommendations from Panel members on how the Panel can proceed most effectively during the preliminary stage of actions on the ERD/HAD.

II. Approval of Transfer of Funds for Future Panel Operations

By the end of January, 1983, there will remain in Phase II administrative funds an estimated balance of \$2,764. These funds are sufficient only for very restricted operations for approximately an additional month and a half. A financial statement for Phase II (as of December 31, 1982) is enclosed.

There remains in the Panel's uncommitted funds from Phase I an amount of \$33,000 (please refer to the enclosed financial statement for Phase I). These funds cannot be transferred into Panel operating categories without authorization from the Management Contacts and Panel members.

During 1983, important work lies ahead especially that concerned with insuring that the VDC Hazard Assessment Document is based on the soundest possible science. Essentially all of this work will be administrative in nature. Therefore, it appears advisable to transfer these uncommitted funds from Phase I into operating Phase II categories as follows:

Administrative	\$20,000
Contingency Fund	13,000

We emphasize that no new funds are being requested. We merely need authorization to make existing funds available to pursue important Panel operations.

Please complete the enclosed authorization and return one copy to the Program Administrator by February 15, 1983.

Kindest personal regards to each of you.

Sincerely,



J. T. Seawell
Administrator
Vinylidene Chloride