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September 11, 1991

TO: Members of the SDA Glycol Ethers Task Force

FROM: John M. Taladay

RE: Status of EPA Review of Glycol
Ethers Under EPCRA § 313

As you know, The Soap and Detergent Association ("SDA") has been working closely with the EPA in an effort to convince the agency to redefine the "Glycol Ethers" definition under § 313 of the Emergency Planning and Community Right-to-know Act ("EPCRA"). In February, SDA submitted extensive data on three particular "glycol ethers," pursuant to EPA's reconsideration of the category. EPA established a target of six months for review of the definition and we had expected a proposed rule to be issued in mid-August.

Unfortunately, EPCRA staff was interrupted in mid-review and was forced to turn their attention to another matter during the summer. Apparently, Congressman Henry Waxman (D-California) proposed that EPA expand the EPCRA § 313 list by over 250 substances under the heading "the Right to Know More." Congressional hearings were held at which EPA staff were called upon to testify. Eventually, the matter was placed on the back burner but only after three months of staff time had been occupied. Following that "emergency," the review of the glycol ethers category was resumed and a proposed rule is now expected in late October or early November.

The upshot of the three month delay is that a final rule is unlikely before mid-1992. This means that another year of reporting probably will be required, regardless of the results of EPA's review.

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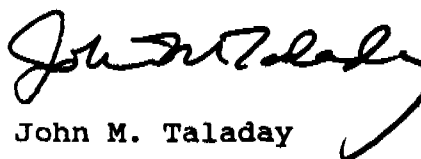
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We have, however, received two pieces of news that are decidedly positive. First, according to both EPCRA and Office of Air Quality Planning and Standards ("OAQPS") staff, the two departments are working closely on the glycol ethers review. Maria Doa expects that, following the review, the two departments will undertake concurrent (though not necessarily identical) redefinition of the category. Since we have not formally approached OAQPS to request reconsideration, a favorable change of the definition could eliminate the need for SDA to repeat this exercise with OAQPS.

Second, I have been informed that EPA is working on a "very narrowly focused definition" of the category. This implies that the formula defining "glycol ethers" will be modified, most likely to establish a carbon chain-length boundary. If this happens, the carbon boundary established should exclude the three surfactants identified by SDA.

I will continue to actively monitor the progress of the EPA review and will keep you advised of developments. When the proposed rule is issued, we encourage active member participation during the comment period to help assure an appropriately favorable resolution of this matter. In the meantime, please call me if you have either questions or news about EPA's review.

Sincerely,


John M. Taladay

JMT/mas

cc: Mr. Richard Sedlak

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