

December 4, 1984

Dear EDC Panel Member:

EPA recently released its final report on Locating and Estimating Air Emissions From Sources of Ethylene Dichloride. Although the document is dated March 1984, it became available in November.

The enclosed letter from Mr. Tom Lahre indicates that EPA has incorporated CMA's comments on the draft report; however, I have not compared the final report against our comments, and therefore do not know to what extent our comments were incorporated.

On a separate subject, the Environmental Health Committee of EPA's Science Advisory Board met on November 29, 1984, to discuss the Committee's conclusion on EPA's EDC Health Assessment Document. The Committee concluded that based upon review of the available literature, EDC can be classified as a probable human carcinogen (class III chemical under IARC classification scheme).

The Environmental Health Committee has drafted a letter on its assessment of the Health Assessment Document on EDC which will be further reviewed by the Executive Committee of the Science Advisory Board. The final letter will be sent to the Administrator of EPA. The Office of Air Quality Planning and Standards will then propose any regulatory actions that it sees fit to minimize the health risk from EDC exposure.

Sincerely,

Has Shah

Hasmukh Shah, Ph.D.
Manager
EDC Program Panel

Enclosure

CMA 051551



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

27 NOV 1984

Hasmukh C. Shah, Ph.D
Chemical Manufacturers Association
2501 M Street, N. W.
Washington, D. C. 20037

Dear Dr. Shah:

Per our November 26, 1984 phone conversation, I am sending you copies of three of our completed reports dealing with sources and emissions of ethylene dichloride, chromium and nickel. I am also enclosing, for your review, copies of draft reports in this same series dealing with chlorobenzenes, phosgene and vinylidene chloride.

The completed documents have incorporated the comments supplied earlier by CMA and other industrial reviewers. We accepted CMA's position regarding the limitations of using these reports for determining the location, configuration or emissions of any particular source and have added strongly worded caveats throughout each report admonishing the reader not to use the data for this purpose.

We welcome any comments your organization may have on the enclosed draft reports. Again, as before, we most appreciate detailed, technical comments that directly allow us to improve the usefulness and credibility of these reports. Especially valuable are comments on and data relating to the completeness and accuracy of the source descriptions, control device efficiencies and emissions data.

We need comments by February 15, 1985 in order to meet our publication schedule. Please let me know if this presents any problem to you.

We appreciate the comments supplied by CMA's members on our past reports. Your comments have materially improved the credibility of these reports to any potential user.

Sincerely yours,

Thomas F. Lahre
Environmental Engineer
Source Analysis Section, AMTB

6 Enclosures

Note: We are readying a draft report on PCBs. Does CMA have a panel or members that could review this draft?
JL

CMA 051552