



Interoffice Communication

To J. J. Hall - Houston
From R. Bryan
Date June 25, 1984
Subject TSCA Chloroprene Request

The attached letter from EPA (TSCA) asks for information about the production of chloroprene at the VCM Plant. As we've discussed, you've agreed to respond to the request based on information supplied by the VCM Plant. Generally, the response will take the position that we make chloroprene only as an inadvertent byproduct which is essentially destroyed internally.

Based on past data, we project that 1.73MM lbs. of chloroprene is produced at full rates (670MM lbs. VCM). This agrees closely with the 1.71MM lbs. given in the 1978 TSCA inventory report.⁽¹⁾ The chloroprene is formed in the furnaces and remains with the recycle EDC from the VCM column. The recycle EDC stream is then chlorinated in a separate reactor to remove the chloroprene. Analysis shows that 99.5% of the chloroprene is destroyed with the balance (8660 lbs./Yr.) leaving in the light ends byproduct. As you know, the process is totally enclosed and presents a negligible occupational exposure problem.

The EPA has requested any special data on chloroprene that we have such as toxicological or environmental reports. There are no such reports at the Plant that we know of and only limited technical data of the type found in engineering books.

Ron Bryan

kf
cc: RAC-JWW-PLF-SRA-DLD-MGH

(1) "EPA Inventory Report", W. L. Groves to J. A. DeBernardi 4/5/78.

TOXIC SUBSTANCES CONTROL ACT

INTERAGENCY TESTING COMMITTEE

401 M Street, SW
Washington, DC 20460

MEMBER AGENCIES
Council on Environmental Quality
Department of Commerce
Environmental Protection Agency
National Cancer Institute
National Institute of Environmental
Health Sciences
National Institute for Occupational
Safety and Health
National Science Foundation
Occupational Safety and Health
Administration

LIAISON AGENCIES
Consumer Product Safety Commission
Department of Agriculture
Department of Defense
Department of the Interior
Food and Drug Administration
National Toxicology Program

MAY 15 1984

CC: JLDW
RB
PLF
DLD
MLA
SFA
JCL
DCE: RAC

R.B.
PLEASE ADVISE
OUR RESPONSE
POSITION

Continental Oil Company
Lake Charles VCM Plant
Box 605
Westlake, LA 70669

Dear Sir:

The TSCA Interagency Testing Committee (ITC) is studying 2-chloro-1,3-butadiene (CAS Registry No. 126-99-8) which has been reported in the TSCA Chemical Substance Inventory as being manufactured by your company.

The ITC was established by Congress, in section 4(e) of TSCA, to make recommendations to the EPA Administrator respecting chemicals that should be given priority consideration for the promulgation of testing rules. The fact that a chemical is selected for study by the ITC does not necessarily mean that it will be recommended for a testing rule. Any recommendation is based on the exposure, effects and estimated risk of injury to health or the environment ascribed to a chemical.

I am requesting information on the above-mentioned chemical to facilitate the Committee's review. Although you are under no legal obligation to furnish the information requested, the ITC would appreciate receiving any relevant unpublished information you may have.

In developing its recommendations the ITC is directed by section 4(e)(1)(A) of TSCA to consider, together with all other relevant information, the following priority factors with respect to chemicals under consideration:

1. Quantity manufactured
2. Quantity which will enter the environment
3. Occupational exposure
4. Non-occupational human exposure

CWH 000005599

5. Similarity in chemical structure to other substances which are known to present an unreasonable risk of injury to health or the environment
6. Existence of data concerning health and environmental effects
7. The extent to which testing will develop useful data on the risk of injury to health or the environment
8. The reasonably foreseeable availability of testing facilities and personnel

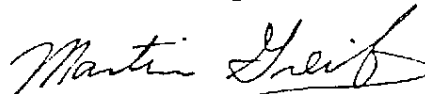
Of particular value would be:

- A. Technical bulletins
- B. Material safety data sheets
- C. Current annual production data and trends
- D. Number of workers exposed, concentrations, controls, use of open versus closed systems, etc.
- E. Use data (types of uses, percent of production by use, etc.)
- F. Environmental impact data (waste control procedures, pollution potential, fraction released to the environment, route of environmental entry, environmental reactions, degradation rates, and ecotoxicity)
- G. Toxicological data (laboratory test protocols and results, occupational and non-occupational epidemiology, etc.)

The information you submit will become part of the public record of the ITC review process unless it is clearly designated as Confidential Business Information (CBI). If you include CBI in your submission, please separate such information from non-confidential information and place it in a separate, sealed envelope clearly marked "TSCA-CBI." It will be treated in accordance with procedures outlined in the "TSCA Confidential Business Information Security Manual."

If you have any questions regarding this request, please call me at (202) 382-3825.

Sincerely,



Martin Greif
Executive Secretary (TS-792)

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