

The Goodyear Tire & Rubber Company

Akron, Ohio 44316-0001

June 23, 1995

Ms Lillian J Kelly
Hazardous Waste Toxicology Section MS-241
California Environmental Protection Agency
601 North 7th Street
Sacramento, CA 94234-7320

Dear Ms Kelly:

Re: January 27, 1995, Lillian J Kelly, M.P.H. Letter to Has Shah, Ph. D.

This letter is in response to Dr Shah's request that The Goodyear Tire & Rubber Company clarify an issue raised in the above referenced letter. (See attached).

In your letter, you had inquired about clarification of information in a 1977 article published in the Journal of the National Cancer Institute, "Angiosarcoma of the Liver". This information referenced ambient emissions of vinyl chloride monomer for a factory located approximately 1,700 feet from a residence being as high as 92,800 parts per million in 1975.

As a matter of information it would be essentially impossible for such an ambient concentration approaching 10% by volume of vinyl chloride to ever occur in the air. Nevertheless, Goodyear's records were searched and, as expected, there were no ambient monitoring results found at the referenced high level.

To the contrary, fence-line monitoring data obtained for Goodyear's Niagara Falls, New York plant in 1975 indicated that vinyl chloride was typically non-detectable.

Additionally, during the 1970's, Goodyear was not the only company operating a PVC manufacturing plant in the Niagara Falls, New York area.

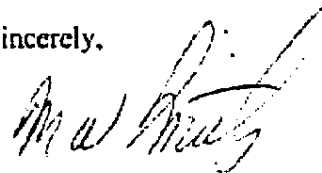
Goodyear believes that the referenced ambient air value must be in error and strongly urges that the State of California not utilize this data in their health risk assessment of exposure to vinyl chloride. It is not scientifically sound to use information that is not substantiated and apparently not correct.

Ms Lillian J Kelly
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June 23, 1995
Page Two

Attached, for your information is a April 5, 199(6?), Jack D Lauber, P. E. Letter to Lillian J Kelly. The Goodyear Tire & Rubber Company strongly supports Mr Lauber's comments.

If I may be any further service, please contact me.

Sincerely,



M W Smith
s5m6s23

Section Manager, Chemical Information
Systems & Regulatory Affairs

Attachments (2)

New York State Department of Environmental Conservation
60 Wolf Road, Albany, New York 12233-3254
Telephone: (518) 457-7888



Michael D. Zagata
Commissioner

Post-it® Fax Note	7871	Date	6/29/96
To	C. Jones	From	J. Carbo
Co./Dept.		On	NYSDOH
Phone #		Phone #	518-457-1689
Fax #	716-236-2650	Fax #	518-457-0944

April 3, 1996

Ms. Lillian J. Kelly
Hazardous Waste Toxicology Section MS-241
California Environmental Protection Agency
601 North 7th Street
P.O. Box 942732
Sacramento, CA 94234-7320

Dear Ms. Kelly:

This is in reply to your March 14, 1995 letter to me and to a previous telephone conversation.

You had inquired about clarification of information in a 1977 article published in the Journal of National Cancer Institute, "Angiosarcoma of the Liver," an epidemiological survey by Brady, et al, that was co-authored by an author of the NYSDOH. This information allegedly discussed emissions of vinyl chloride monomer at approximately 1,700 feet from a residence being as high as 92,800 ppm in 1975.

I have checked with our Bureau of Air Quality Surveillance and Region 9 staff. There are no records or reports of such toxic ambient monitoring results that we can find relating to previous ambient studies of vinyl chloride in Niagara Falls near the Goodyear Chemical Company. However, such gross emissions appear to be a typographical error or misinterpretation of emission data. It would be virtually impossible for such concentrations approaching 10% by volume of vinyl chloride to ever occur in the ambient air.

I have experience in the manufacture of polyvinyl chloride (PVC) from vinyl chloride monomer, which is the process operated by Goodyear at Niagara Falls, New York. During the mid-1970's the U.S. EPA was developing the vinyl chloride NESHAP, and at that time there was a fair degree of control of vinyl chloride monomer from the Goodyear facility. Several years later, I believe the vinyl chloride emissions were largely in compliance with the NESHAPs and controlled to about 10 ppm at the source as per the terms of this regulation. In reality, there should be very few process emission sources of vinyl chloride from such a facility except for a few PVC product stripping facilities that could have had emissions above the NESHAPs standards in 1975. However, it is

inconceivable that such emissions could ever produce vinyl chloride emissions that would ever exceed several ppm in the ambient air on an uncontrolled basis. Consequently, the information you quoted from this previous article appears to be in error. Perhaps, the PVC emission measurement values were much smaller, such as nanograms/cubic meter, rather than ppm. It would be imprudent to quote this apparently incorrect information in your health studies and evaluations of this toxic air contaminant.

Sincerely,

Jack D. Lauber, P.E.
Chief, Technology Assessment Section
Bureau of Application Review
and Permitting
Division of Air Resources

bjs

cc: J. Higgins
E. Bennett
P. Lavin
T. Cullen
P. John
P. Galvin
S. Gubner
H. Sandomato
L. Stiller
J. Schreiber
T. Gentile
Dr. A. Stark, NYSDOH

OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT



January 27, 1995

Has Shah, Ph.D.
Chemical Manufacturers Association
2501 M Street NW
Washington D.C., 20037

Dear Dr. Shah:

Thank you for your phone call yesterday, following-up on a copy of a letter from this Office dated September 19, 1994 to Francoise Drion, M.D., Association of Plastics Manufacturers in Europe, regarding the worldwide registry of cases of liver angiosarcoma from occupational exposure to vinyl chloride. As explained in the letter, the Office of Environmental Health Hazard Association (OEHHA) is completing a health risk assessment of exposure to vinyl chloride in a residential community immediately adjacent to a closed hazardous waste landfill.

Enclosed, as you requested, is a copy of the November 1990 interim health risk assessment of the landfill, and the October 1990 proposed identification of vinyl chloride as a Toxic Air Contaminant in California. In December 1990, the Air Resources Board adopted the unit risk value for vinyl chloride recommended in the October report (20×10^{-6} [ppb]⁻¹).

In July 1991, Governor Wilson created the California Environmental Protection Agency (Cal/EPA). The Hazardous Waste Toxicology Section, which prepared the interim health risk assessment, and the Air Toxicology and Epidemiology Section, which prepared the Toxic Air Contaminant report, were transferred from the Department of Health Services to OEHHA in Cal/EPA.

You mentioned the Chemical Manufacturers Association nine-member panel of manufacturers of vinyl chloride in the United States. I would like to take this opportunity to ask if any of the manufacturers could provide clarification regarding the New York resident diagnosed with liver angiosarcoma reported by Brady *et al.*, in "Angiosarcoma of the Liver: An Epidemiologic Survey", *Journal of the National Cancer Institute*, 1977, 59(5): 1383-11385. The authors state "Of possible importance is the fact that the ambient emissions of VC monomer for the factory located approximately 1,700 feet from the residence of patient #10 were as high as 92,800 parts per million in 1975."

I am looking forward to receiving the articles and information you are sending, and to further discussions with you.

Sincerely,

Lillian J. Kelly, M.P.H.
Associate Hazardous Materials Specialist
Hazardous Waste Toxicology Section

Enclosure

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Lillian J. Kelly, M.P.H.
Associate Hazardous Materials Specialist
Hazardous Waste Toxicology Section

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