

TGG: JCL: MMG: AJO: BA

XF: **136**

VISTA

March 8, 1989

Mr. Hank Sauer
CMA
2501 M. Street N.W.
Washington, D. C. 20037

Dear Hank:

Below are general comments on the EDC ATSDR EDC Toxicological Profile Draft. I've also attached a marked copy of the draft indicating the areas of concern mentioned below.

Summary Comments on EDC ATSR Toxicological Profile

- 1.1 Are current use descriptions accurate? Is anyone aware of some of the uses cited such as commercial solvents?
- 1.2 Similar comment to 1.1. Is exposure from household cleaning products realistic?
- 1.6 In general the MRL's seem awful low. How are they calculated? This concept should be described further.
- 1.7 The OSHA PEL information is now out of date. The second paragraph is incomplete to the point of being a misrepresentation of the significance of the issues.
- 2.2.1.8 The statement of human cancer not being detected is contradictory to statement in 1.4 regarding "similar effects seen in humans.... The 1.4 description should be clarified.
- 2.2.2.8 We should make our usual comments regarding the NCI study problems.
- 2.3 The 1st statement of the second paragraph needs some context or further explanation.

Page 46- NCI study comments are needed here also.

In general the Data Needs section is filled with the statement "... data would be useful" with little explanation of the significance of the additional data or what it would add to risk assessment, etc. This is dangerous verbiage in that Section 4 test rules could come out of these profiles.

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Multiple studies are available on VCM worker populations which include EDC exposure. This is ignored in Section 2.9.2., chronic exposure and carcinogenicity.

The health effects sections constantly implies significant exposure potential around waste sites and recommends studies based on this.

This is highly speculative and should be toned down or eliminated in the text!

4.4 The second paragraph is an inadequate description of steam stripping. No one "boils". Also EDC is seldom always transferred to the air when steam stripping.

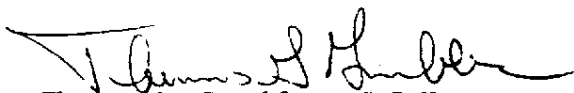
Table 4.1 This number is relatively accurate for Vista. Is it for other members? Also impacts table on Page 78. We should check vs. Form R values.

Section 5.2.3. States EDC is landfilled. This is against the law with the land ban regulations.

Section 5.5 It seems the exposed population estimates are generally high. The contractor states that on Page 84 but does nothing to correct them. They also mention volatilization from consumer products again.

Section 5.7.1. Exposure levels in humans - states exposure measurements in the workplace are generally inadequate. Should we send data?

Sincerely,



Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

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