SPECIAL PROGRAMS NEWSLETTER

CHEMICAL MANUFACTURERS ASSOCIATION 2501 M STREET NW, WASHINGTON, DC 20037 202/887-1100

Volume 4, No. 2 June 1987

BEGINNING THE BEGUINE WITH SARA

The Superfund Amendments and Reauthorization Act (SARA) was signed into law last October. The Act contains extensive new provisions on health related authorities which could result in enormous costs for individual companies. An understanding of the requirements in Title I, Section 110 is critical for any person responsible for the manufacture or fate of affected chemicals (listed on the next page).

Can you do anything if your chemical is on the Section 110 lists? Yes. Soon. Read on.

The Agency for Toxic Substances and Disease Registry has primary responsibility for the health related authorities, with some EPA involvement. Section 110 gives ATSDR responsibility in four areas:

Hazardous Substances List and Toxicological Profiles. ATSDR, along with EPA, must list 200 substances by October 1988 and 25 substances per year for the subsequent three years. The list, shown on the next page, of the 100 most hazardous substances found at waste sites was published on April 17.

For the first 25 chemicals (Priority Group 1), toxicological profiles that identify data needs and set significant human exposure levels (SHELs) will be developed by October 17. Profiles on chemicals in Priority Groups 2-4 will be developed over a three-year period.

SHELs will be used to calculate potential risks for populations near waste disposal sites and could have significant liability implications. ATSDR has not yet determined criteria for setting SHELs.

IN THIS ISSUE

ATSDR PRIORITY LIST OF 100 HAZARDOUS SUBSTANCES

PRIORITY GROUP 1

CAS No.	Substance name
50328	Benzo(a)pyrene
53703	Dibenzo(a,h)anthracene
56553	Benzo(a)anthracene
57125	Cyanide
60571	Dieldrin/aldrin
67663	Chloroform
71432	Benzene
75014	Vinyl chloride
75092	Methylene chloride
76448	Heptachlor/heptachlor epoxide
79016	Trichloroethene
86306	N-nitrosodiphenylamine
106467	1,4-Dichlorobenzene
117817	Bis(2-ethylhexyl)phthalate
127184	Tetrachloroethene
205992	Benzo(b)fluoranthene
218019	Chrysene
1746016	P-Dioxin
7439921	Lead
7440020	Nickel
7440382	Arsenic
7440417	Beryllium
7440439	Cadmium
7440473	Chromium
11096825	PCB-1260,54,48,42,32,21,1016

PRIORITY GROUP 2

CAS No.	Substance name
56235	Carbon tetrachloride
57749	Chlordane
62759	N-nitrosodimethylamine
72559	4,4'-DDE, DDT, DDD
75003	Chloroethane
75274	Bromodichloromethane
75354	1,1-Dichloroethene
78591	Isophorone
78875	1,2-Dichloropropane
79005	1,1,2-Trichloroethane
79435	1,1,2,2-Tetrachloroethane
87865	Pentachlorophenol
91941	3,3'-Dichlorobenzidine
92875	Benzidine
107062	1,2-Dichloroethane
108883	Toluene
108952	Phenol
111444	Bis(2-chloroethyl)ether
121142	2,4-Dinitrotoluene
319846	BHC-alpha, gamma, beta, delta
542881	Bis(chloromethyl)ether
621647	N-nitrosodi-n-propylamine
7439976	Mercury
7440666	Zinc
7782492	Selenium

PRIORITY GROUP 3

CAS No.	Substance name
71556	1,1,1-Trichloroethane
74873	Chloromethane
75218	Oxirane
75252	Bromoform
75343	1,1-Dichloroethane
84742	Di-N-butyl phthalate
88062	2,4,6-Trichlorophenol
91203	Napthalene
98953	Nitrobenzene
100414	Ethylbenzene
107028	Acrolein
107131	Acrylonitrile
108907	Chlorobenzene
118741	Hexachlorobenzene
122667	1,2-Diphenylhydrazine
124481	Chlorodibromomethane
156606	1,2-Trans-dichloroethene
193395	Indeno(1,2,3-cd)pyrene
606202	2,6,Dinitrotoluene
1330207	Total xylenes
7221934	Endrin aldehyde/endrin
7440224	Silver
7440508	Copper
7664417	Ammonia
8001352	Toxaphene

PRIORITY GROUP 4

CAS No.	Substance name
51285	2,4-Dutrophenol
59507	P-Chloro-m-cresol
62533	Aniline
65850	Benzoic acid
67721	Hexachloroethane
74839	Bromomethane
75150	Carbondisulfide
75694	Fluorotrichloromethane
75718	Dichlorodifluoromethane
78933	2-Butanone
84662	Diethyl phthalate
85018	Phenanthrene
87683	Hexachlorobutadiene
95487	Phenol,2-methyl
95501	1,2-Dichlorobenzene
105679	2,4-Dimethylphenol
108101	2-Pentanone, 4-Methyl
120821	1,2,4-Trichlorobenzene
120832	2,4-Dichlorophenol
123911	1,4-Dioxane
131113	Dimethyl phthalate
206440	Fluoranthene
534521	4,6-Dinitro-2-methylphenol
541731	1,3-Dichlorobenzene
7440280	Thallium

ATSDR's handling of the Priority Group 1 chemicals will set precedents for the remaining Groups and future listings. In particular, the toxicological profiles for these first 25 chemicals will serve as standards for data evaluation, determination of data needs and methods for setting SHELs.

Health Effects Research. Where adequate information is not available on the health effects of a listed chemical, ATSDR, in consultation with EPA and the Public Health Service, must initiate a research program to fill the data gaps. The program must include studies to determine short and long-term health effects. ATSDR has not yet determined the mechanisms for accomplishing the studies. One solution mentioned is requiring manufacturers and processors of the chemical to bear the costs of research. This overall expense could dwarf current toxicological testing costs under Section 4 of TSCA.

Health Assessments. ATSDR must perform a health assessment for every site on the National Priorities List by December 1988. A health assessment is a preliminary estimation of potential risks to human health posed by an individual site. Ultimately the health assessment will help determine whether action should be taken to reduce human exposure and whether additional information on human exposure and health risks is needed. ATSDR states that the average cost of a health assessment is $4,000 per site. Costs of conducting health assessments may be paid initially from the Superfund trust fund and subsequently recovered from responsible parties.

Further Health Studies. ATSDR may conduct pilot or full scale epidemiological studies based on the results of the health assessments. ATSDR estimates that the cost of a pilot study will be at least $30,000 and a full scale study will be at least $100,000. Like the health assessments, costs of these studies may be paid initially from the Superfund trust fund and subsequently recovered from responsible parties.

CMA's Hazard Assessment Task Group has drafted comments on the April notice. The comments point out the shortcomings in the selection process for listed chemicals. CMA also asks that the toxicological profiles contain a critical evaluation of each health effects study, include all relevant positive and negative studies, and use a weight-of-evidence approach in drawing conclusions on the effects of the chemicals. In addition, the comments recommend that several risk approaches be used to determine the SHEL and that a range rather than a single value be selected for the SHEL.

What should you do? First, if your company's chemical is listed in Priority Group 1, you should submit significant data quickly to the EPA contractor responsible for preparing the profile. You also can nominate profile peer reviewers. These reviewers must have knowledge of the chemical and not have a conflict of interest. Nominations can be sent directly to ATSDR at Building 28 South, Chample, 1600 Clifton Road, Atlanta, Georgia 30333. A 90-day comment period following publication of the toxicological profile will allow another opportunity for input later this year. If your company's chemical is listed on Priority Groups 2 through 4,

comments and unpublished data should be sent to Document Control Officer, OTS, EPA Room NE-6004, 401 M Street, SW, Washington, D.C.

Representatives from affected panels will be invited to a SARA Inter-panel Coalition meeting on August 6. The agenda will include briefings on current status and consideration of strategies for joint actions. Affected panel members should contact their program manager for further information and advice.

E. Moran
L. Ramonas

PROPOSITION 65 UPDATE

Recently, representatives of eleven panels met to discuss means of addressing specific chemical concerns during implementation of the Law. The Prop. 65 Coalition will meet again on August 5 at CMA to develop strategies in conjunction with the CMA Toxics Initiative Work Group. Interested persons should contact Dr. Elizabeth Moran at 202/887-1182.

The Director of the California Department of Health Services, Dr. Kenneth Kizer, recently called Proposition 65 the "wave of the future." He predicted that most states will adopt similar legislation and that nearly all states with an initiative and referendum process will eventually have it on the ballot.

Meanwhile, California's Health and Welfare Agency continues to develop regulations to implement the new law. A court battle is ongoing to determine the statutory listing of carcinogens and reproductive toxins. The Governor's office has filed an expedited appeal to the recent state Superior Court ruling that increased the list to over 200 chemicals. It is anticipated that the recently appointed Science Advisory Panel will add chemicals to the list regardless of what happens in the lawsuit. The Agency is polling state and federal agencies to ascertain which chemicals should be labeled as carcinogens or reproductive toxins -- criteria for listing under the Act.

Undersecretary of Health and Welfare, Thomas Warriner, has established three ad hoc committees to advise him on specific areas of regulation: environmental warnings, product warnings and discharge prohibitions. Representatives from state and local governments, public interest organizations and business form the membership of these committees. Business and industry groups, meeting through the Environmental Working Group, are commenting on the regulations and developing papers on issues and definitions related to implementation of the law.

The CMA State Affairs Committee continues to monitor implementation of the Law through the California Chemical Industry Council. The Committee is particularly sensitive to possible precedents for other states. You should be alert to any Proposition 65-type issues (either ballot initiatives or proposed legislation) and keep your state organization, as well as CMA, informed. The CMA contact is Joan Riley at 202/887-1268.

Joan Riley
Manager, State Issues, CMA

TSCA/RCRA ENGAGEMENT ANNOUNCED

In the March Newsletter we reported that a TSCA Section 4 test rule was expected soon from EPA which would require industry to pay for testing 73 chemicals of interest to the Office of Solid Waste. The proposed test rule was published in the Federal Register on May 29 (see Recent Releases Section). The required data is intended to support EPA's hazardous waste "relisting" program under the Resource Conservation and Recovery Act.

Relisting is an effort aimed at determining the concentration of a waste constituent, below which no significant risk is associated. Establishing this concentration will allow the continued disposal of wastes not considered hazardous in landfill facilities.

The Agency is proposing that current manufacturers pay for the required testing. This may be contradictory to Section 4(b) of TSCA which states that the activity for which the Agency makes Section 4(a) findings determines who bears the responsibility for testing. In this case, disposal is the activity of concern, not manufacturing. EPA also proposed that for chemicals no longer manufactured, testing would not be required until manufacturing is resumed. A threshold volume, below which testing would not be required, is being considered for small quantity research and development chemicals.

Comments on this proposed rulemaking may be submitted to EPA until July 28. The CMA Health and Safety Committee has established a TSCA/RCRA Ad Hoc Work Group to address generic concerns raised by the proposal. CMA comments will focus on the statutory requirements of TSCA and the category approach taken in this rule. Concerns on specific chemicals will not be addressed directly by the Group, however these issues may be included as examples or submitted as attachments to the CMA comments. Affected panel members may work through your Special Program to develop comments. Others may contact Nancy Doerrer of CMA (202/887-1282) to coordinate efforts through the Work Group.

K. Rosica

SPOTLIGHT: Biocides

This is the seventh of a series, highlighting the activities of various Special Programs.

Manufacturers of industrial biocides formed a Special Program in 1986 to address the California Department of Food and Agriculture's Data Call-In on over 700 pesticidal chemicals. Since then, the Panel has commented on the need for data generation, data compensation procedures, and data confidentiality provisions. Now the Panel has expanded its focus to address regulatory issues affecting biocides at the Federal level. Currently, the Panel is chaired by Jane Yuster of Troy Chemical Corporation. Claude Wolf of Nalco Chemical Company is the Vice-Chairman.

One of the Panel's primary objectives is to persuade Federal and state regulators that non-agricultural pesticides should be regulated differently from agricultural pesticides because exposures to industrial biocides are very limited. Also, markets are small and the economic impact of regulation on the biocide industry is much greater.

California. The Panel established five chemical-specific task forces -- Arsenic Acid, Creosote, Mercurial Compounds, Naphthenates, and Copper-8 -- to address the Data Call-In. The task forces first provided comments giving reasons why the testing required by CDFA is not necessary. This February, representatives of the Arsenic Acid, Creosote, and Copper-8 Task Forces met with CDFA. During the discussions, CDFA staff conceded they had not reviewed all the previously submitted material. Subsequently, the Department issued an errata sheet indicating that conclusions in its report to the legislature concerning arsenic acid, creosote, and copper-8 may not be correct. CDFA currently is reviewing the task forces' comments, and will issue a new decision soon.

Antimicrobial Testing. In March, EPA initiated a data call-in on approximately 300 antimicrobials. The Agency believes that subchronic toxicity data are necessary to evaluate potential health hazards.

In April, the Panel invited all EPA registrants of antimicrobials to a meeting to discuss the industry's options for responding to the data call-in. As an outcome, the Panel has submitted several comments to EPA outlining legal, technical and economic problems with the call-in. The Panel believes that completing exposure studies before establishing toxicological requirements would be more logical from technical and economic standpoints. Currently, EPA has only arbitrarily placed chemicals into high, medium, and low exposure categories. The Panel now has formed exposure assessment task forces to address several end-use areas.

The Panel plans to work with EPA in developing a rational research program and minimizing the negative impact on the industry.

Inorganic Arsenicals. On April 7, EPA issued under FIFRA a special data call-in notice on wood preservatives containing inorganic arsenicals. The Agency required protective clothing permeability studies on the arsenicals and a teratogenicity study on arsenic acid. The Arsenic Acid Task Force will sponsor the required studies.

Pesticide Inerts Policy. EPA has classified approximately 1,200 chemicals registered as inert ingredients in pesticide formulations into four categories based on known, presumed, inadequate knowledge of, or lack of toxicological concern.

The Agency's inerts policy was issued in the Fed. Reg. (see Recent Releases Section). EPA also provides copies of its operating procedures for inerts on an as requested basis. The Panel closely monitors EPA's activities in the inerts area and plans to work with the Agency when necessary.

FIFRA Registration Fees. Last November, EPA proposed rules defining fees for various pesticide registrations. The fees may run as high as $163,000 for registration of a pesticide and could place major hardships on small producers of industrial biocides. The Panel filed comments on the proposed rule, stating that EPA lacks the statutory authority to impose these fees, and even if it had the authority, the Agency failed to consider the economic impact on industrial biocide producers. EPA has not issued the final rule; however, there are indications that the Agency is seriously considering the Panel's comments

and may reissue a revised proposed rule.

FIFRA Reauthorization. The Panel is monitoring FIFRA reauthorization activities in Congress. Specifically, the Panel is concerned with user fees, re-registration of existing pesticides, and assessment of monetary value for health and safety data shared among manufacturers.

H. Shah

NEWS BRIEFS

FAVORABLE RULING IN DIOXINS/FURANS SUIT

(Washington, March 30) EPA's "right to set its own priorities" in the face of citizen petitions under the Toxic Substances Control Act was affirmed in a Federal court decision. The Court ruled that EPA need not refute the possibility of unreasonable risk to deny a TSCA Section 21 petition. The Dibenzofurans/Dioxin Panel had intervened on behalf of EPA in the suit.

The ruling by the U.S. District Court for the District of Columbia came in a lawsuit filed in 1985 by the Environmental Defense Fund and the National Wildlife Federation. The two environmental groups had asked the Court to reverse EPA's denial of their request to initiate a comprehensive TSCA Section 6 rulemaking addressing dioxin and furan impurities in products and in the environment.

CHLOROBENZENES PANEL INITIATES TESTING

(Washington, April 1) Panel members initiated testing required under the TSCA Section 4 Chlorobenzenes Health Effects Test Rule. EPA is requiring oncogenicity testing in rats and mice on 1,2,4-trichlorobenzene; developmental toxicity studies and a two-generation reproductive study on 1,2,4,5-tetrachlorobenzene; and a reproduction and fertility study on o-dichlorobenzene. A reproduction study on p-dichlorobenzene will begin next month. Environmental effects testing will start when EPA finalizes the test standards for the final rule.

OSHA ISSUES GLYCOL ETHERS ANPR

(Washington, April 2) OSHA published an Advance Notice of Proposed Rulemaking on 2-methoxyethanol, 2-ethoxyethanol and their acetates (see Recent Releases). This action follows EPA's referral under TSCA Section 9(a) and OSHA's review of the reproductive, developmental and hematological effects associated with exposure to these compounds in animal studies. The Glycol Ethers Panel is in the process of reviewing the ANPR and preparing a response by the July 31 deadline.

EPA ANNOUNCES PCB RULE

(Washington, April 2) After more than two years of discussions, EPA's Office of Toxic Substances finally released its policy/rule on PCB spill cleanup. The Notice contained many of the provisions sought by the Consensus Group of industry and environmentalists, but several areas still require clarification. The PCB Panel is considering comments.

PHTHALATE ESTERS PANEL, CIIT, HSIA MEET

(Washington, April 29) Members of the Phthalate Esters Toxicology Research Task Group met with Dr. Jim Popp of CIIT,

and Dr. Dan Byrd of the Halogenated Solvents Industry Association to discuss similar research plans on the class of compounds known as peroxisome proliferators. The groups plan to pursue research efforts that will further clarify the relationship between peroxisome proliferation and cancer, and help to determine the relevance of this data to humans. Dr. Derek Guest, Chairman of the Panels' FDA Task Group, was also on hand to discuss a testing program covering similar concerns on di-ethylhexyl adipate.

TRIETHYLENE GLYCOL ETHERS NEGOTIATIONS BEGIN

(Washington, May 19) EPA announced negotiations for development of a consent agreement on testing of triethylene glycol ethers (see Recent Releases). EPA solicited public participation and announced its timetable for negotiating a consent order. The Glycol Ethers Panel has signed on as an interested party and has since met twice with EPA. The Panel already had initiated voluntary testing and submitted plans for future studies in their response to an earlier NPR. A decision by EPA on whether to use a consent order or finalize the test rule is expected at the end of June.

EPA PUBLISHES "SHOULD-SHALL RULE"

(Washington, May 20) EPA published a final rule that amends the test guidelines under TSCA Section 4 (see Recent Releases Section). In many instances substituting the word "shall" for "should" constitutes the only, but significant, amendment.

EPA intends that these test guidelines become mandatory and enforceable when issued as standards in test rules. Flexibility of the test protocol as applied to a specific chemical will be subject to notice and comment at that time. It now is more important to give close attention to all aspects of test protocols at the proposed rule stage. The revisions involve minimum requirements for test procedures, analytical measurements, test conditions, animal selection, use of controls, number of dose levels, facilities, observation period, administration of substances, observation of animals, clinical exams, gross necropsy, histopathology and reporting of the data.

The Fed. Reg. notice did not include EPA responses to public comments and several important considerations are not discussed. The responses include commentary on technical aspects of specific test guidelines and were published in a separate April 1987 document of 155 pages. The document is available through the EPA Freedom of Information Officer; U.S. EPA; Mail Stop (A-101); 401 M Street, SW; Washington, DC; 20460.

MESITYL OXIDE TEST STANDARDS APPEAR

(Washington, May 20) Final test standards applicable to the Mesityl Oxide Final Test Rule were published (see Recent Releases). The Ketones Panel will seek a stay of the testing until a decision is reached in the challenge of the Rule in the Fifth Circuit Court. Briefing has been completed in the case and oral argument is scheduled for July 7. In the event that the stay is not granted, the Panel is making preparations to

initiate the first tier of required testing.

CYCLOHEXANE PROPOSED TEST RULE PUBLISHED

(Washington, May 20) EPA proposed that manufacturers and processors of cyclohexane be required to perform testing under TSCA Section 4 for chronic toxicity, oncogenicity, reproductive toxicity, developmental toxicity, neurotoxicity, dermal absorption and dermal sensitization (see Recent Releases). The proposed rule contains the same test battery that EPA proposed in July 1986 when initiating negotiations for an enforceable testing consent agreement. The Cyclohexane Program Panel is preparing written comments due by July 20. A final rule is anticipated in March 1988.

CRESOLS PANEL TO INITIATE TESTING

(Washington, May 20) The Final Phase II test standards and reporting requirements for cresols under TSCA Section 4 were published (see Recent Releases). The Cresols Panel will submit study plans for the required mutagenicity, reproductive and development effects testing on o-, m-, and p-cresol. Testing will begin this July and will be completed in 1989.

MDA PANEL COMPLETES MEDIATED RULEMAKING

(Washington, May 22) A fifteen member Mediated Rulemaking Advisory Committee established by OSHA to develop a Workplace Standard for 4,4'-methylenedianiline completed its activities. The MDA Panel was involved in this mediated rulemaking procedure from its inception. The Committee consisted of representatives from industry, labor unions, and government agencies including OSHA, NIOSH, DOE, EPA, the Department of Labor and California OSHA. Two government contractors also participated. Industry representatives were Roger Daniel (Dow Chemical) representing the Panel, John Keane (General Electric) representing NEMA and Richard Champlin (Hercules) representing SACMA. The Committee met monthly, beginning in July 1986, to develop a consensus standard. The standard, which the Panel feels is quite favorable, will be published in the Federal Register as part of the Committee report. Within 90 days of the report publicati n, OSHA will issue a proposed rule for a workplace standard on MDA which is expected to parallel the Committee report. The final OSHA rule, if uncontested, will appear in mid-1988.

FINAL HYDROQUINONE TEST RULE READY

(Washington, May 28) TSCA Section 4 test standards and reporting requirements for hydroquinone were published (see Recent Releases). The Final Phase II test rule becomes effective on July 13. The final test reports on oral and dermal pharmacokinetics studies and neurotoxicity testing are due at EPA by July 1989. The final report on two-generation reproductive effects on the rat is due by December 1989. The Panel is working with EPA to clarify the test standards before beginning the required testing.

PCB PANEL TALKS TO CONGRESS

(Washington, June 1) Representatives of the PCB Panel met with members of Congressmen Synar and Skelton's staffs, other members

of the PCB Consensus Group, and staff members from several EPA offices to discuss the Agency's intention to move PCB storage and disposal regulations from TSCA to RCRA authority. Some members of Congress feel that PCBs could be more effectively regulated under RCRA. The plan proposed by EPA's Office of Solid Waste would take up to two years to implement and could be potentially very disruptive. The Consensus Group feels it would be more efficient to strengthen TSCA rules to address the concerns of Congress. Group members have already outlined, in letters to OSW Director Marcia Williams, possible changes to TSCA that would improve the permitting of disposal facilities, manifesting, and enforcement. The Group is considering further approaches to EPA.

CFC ACTIVITY HEATS UP

(Washington, June 1) NRDC and EPA have agreed to modify the timetable for proposing further U.S. regulation of chlorofluorocarbons until after international negotiations to control CFCs on a global basis have been completed. EPA now has until December 1 to decide whether further regulations (beyond the 1978 aerosol ban) are necessary. Delegates to the UNEP negotiation session held in Geneva during May reached tentative agreement on a global protocol. Representatives agreed, in principle, to a cap on the production of as yet unspecified CFCs. The cap would be in place by 1990 and would h ld production at 1986 levels. A further phasedown is also being discussed. The U.S. position on the protocol is being hotly debated by members of the Reagan Administration. Some feel that it goes too far, too fast. EPA, the Department of State and some members of Congress continue to advocate stringent restrictions, including up to a 95% phaseout of all CFC uses. Interior Secretary Hodel reportedly suggested that people should take some personal responsibility in protecting themselves by wearing hats, sunglasses, and sunscreen to help decrease the number of skin cancers that are currently occurring due to exposure to ultraviolet light. Media coverage of the issue has increased tremendously, with many editorials and articles. The Fluorocarbon Panel is monitoring this activity closely.

CUMENE PANEL RECEIVES DATA

(Washington, June 2) The Cumene Panel received the final report on studies sponsored to clarify response to cumene in mutagenicity assays. Cumene was tested in the Ames, chromosome aberrations, unscheduled DNA synthesis, point mutation, and cell transformation assays and was found to be negative in all assays under all conditions tested. In November 1985, EPA issued a proposed test rule on cumene. The Agency based the rule largely on the results of inadequate mutagenicity tests. The Panel will submit the new data to EPA in hopes that the clarified results will allay EPA's concerns.

PEOPLE

FLUOROCARBON PANEL LEADERS REAFFIRMED

At elections held recently, Dr. S. Robert Orfeo of Allied-Signal Corporation was re-elected Chairman of the Fluorocarbon Panel. Dr. Gordon Diprose of ICI, PLC. was also re-elected

to another term as Vice Chairman of the Panel. Their one-year terms began June 1. We again congratulate Bob and Gordon.

ALKANOLAMINES PANEL ELECTS OFFICERS

The Alkanolamines Panel has elected Ed Bentley of Texaco Chemical Company to serve as Chairman and Stan Dombrowski of Dow Chemical USA to serve as Vice Chairman. Congratulations to both. We look forward to their leadership.

NEW PROGRAMS

SPECIALTY ACRYLATES AND METHACRYLATES

Manufacturers and users of specialty acrylates and methacrylates have requested establishment of a Special Program at CMA. The Panel will address restrictions placed on new chemicals by EPA in the premanufacture notice review procedure under Section 5 of TSCA. EPA's concerns stem from a few rodent bioassays on chemicals that the Agency considers structurally related to the new acrylates and methacrylates. The restrictions include labeling requirements, limits on distribution and specific work practices. These restrictions are not mandated for the structurally related materials. The Program's member companies feel that the structural analogies are weak and that the restrictions are unwarranted.

The Panel's major objectives are to obtain relief from the most restrictive provisions and to develop a better structure-activity framework for review of these chemicals.

Currently 14 companies have agreed to participate in the Program. Paul Nelson of Radcure Specialties will Chair the Panel. Harold Flegenheimer of Interchem, Inc. will serve as Vice-Chairman. If you wish to join the Panel, or want additional information, please call Dr. Elizabeth Moran at 202/887-1182.

ALKYLPHENOLS AND ETHOXYLATES

A group of manufacturers and users of alkylphenols and ethoxylates met recently and agreed to request a Special Program under CMA. The new panel will address anticipated regulatory agency activities under TSCA and the Clean Water Act. The Panel also will generate and evaluate information necessary to assess any environmental or health effects.

Dr. Jay Ansell of the GAF Corporation was elected Chairman of the Panel. Dr. James Mieure of the Monsanto Company was appointed chairman of the Environmental Risk Assessment Task Group and Dr. Isadore Morici of the Rohm and Haas Company was appointed Chairman of the Toxicology Research Task Group. Companies interested in joining the Program should contact Henry Sauer (202/887-1189).

RECENT RELEASES

SPECIAL PROGRAMS COMMENTS

Comments to the State of New Jersey on the HAZARDOUS SUBSTANCES FACT SHEET ON BIS(2-ETHYLHEXYL) PHTHALATE (DEHP).
(filed by the Phthalate Esters Panel, March 17, 1987)

Comments to the U.S. HOUSE OF REPRESENTATIVES on DEPLETION OF

THE EARTH'S STRATOSPHERIC OZONE LAYER
(filed by the Fluorocarbon Panel, March 20, 1987)

Comments to OSHA on the DRAFT MDA ADVISORY COMMITTEE REPORT
(filed by the Methylenedianiline Panel, April 1, 1987)

Comments to the THE U.S. HOUSE OF REPRESENTATIVES on WORLD WIDE PRODUCTION OF CFC-113
(filed by the Fluorocarbon Panel, April 3, 1987)

Comments to EPA on EPA'S EFFORTS TO TRANSFER PCB STORAGE AND DISPOSAL REGULATIONS FROM TSCA TO RCRA AUTHORITY
(filed by the Polychlorinated Biphenyls Panel, April 28, 1987)

Comments to OSHA on the REVISED DRAFT ADVISORY COMMITTEE REPORT
(filed by the Methylenedianiline Panel, April 28, 1987)

Comments to UNEP on the report of the AD HOC MEETING OF EXPERTS TO COMPARE MODEL PROJECTIONS OF OZONE LAYER MODIFICATION RELATING TO THE APPLICATION OF CONTROL STRATEGIES FOR CHLOROFLUOROCARBONS UNDER A PROTOCOL ON THE CONTROL OF CHLOROFLUOROCARBONS TO THE VIENNA CONVENTION FOR THE PROTECTION OF THE OZONE LAYER
(filed by the Fluorocarbon Panel, April 29, 1987)

Comments to EPA on CMA BIOCIDES PROGRAM PANEL REQUEST TO MODIFY ANTIMICROBIAL DATA CALL-IN
(filed by Biocides Panel, May 15, 1987)

Comments to EPA on EPA'S PROPOSAL TO ADJUST REPORTABLE QUANTITIES
(filed by the Polychlorinated Biphenyls Panel, May 15, 1987)

Comments to the SYRACUSE RESEARCH CORPORATION on DEVELOPMENT OF A TOXICOLOGICAL PROFILE FOR PCBs
(filed by the Polychlorinated Biphenyls Panel, May 22, 1987)

Comments to the U.S. SENATE on STRATOSPHERIC OZONE DEPLETION AND SUBSTITUTES FOR OZONE DEPLETING SUBSTANCES
(filed by the Fluorocarbon Panel, May 27, 1987)

Comments to EPA on the ROUTE OF ADMINISTRATION FOR 2-EH BIOASSAY TESTING REQUIREMENTS
(filed by the 2-Ethylhexanol Panel, June 2, 1987)

Comments to FDA on INFORMATION ON CRITICAL ISSUES TO EVALUATE THE CARCINOGENICITY OF BUTYLATED HYDROXYTOLUENE FOR HUMANS
(filed by the Butylated Hydroxytoluene Panel, June 8, 1987)

FEDERAL REGISTER NOTICES

POLYCHLORINATED BIPHENYLS SPILL CLEANUP POLICY; FINAL RULE (52 FR 10688, April 2, 1987)

HEALTH AND SAFETY STANDARDS; OCCUPATIONAL EXPOSURE TO 2-METHOXYETHANOL, 2-ETHOXYETHANOL AND THEIR ACETATES (52 FR 10586, April 2, 1987)

INERT INGREDIENTS IN PESTICIDE PRODUCTS; POLICY STATEMENT (52 FR 13305, April 22, 1987)

PROPOSED RULE UNDER TSCA TO GATHER INFORMATION ON 36 CHEMICALS USED AS INERT INGREDIENTS IN PESTICIDES (52 FR 18245, May 14, 1987)

CHEMICAL INFORMATION RULES; ADDITION OF CHEMICALS (52 FR 18250, May 14, 1987)

TESTING CONSENT AGREEMENT DEVELOPMENT FOR CHEMICAL SUBSTANCES UNDER TSCA SECTION 4; SOLICITATION FOR PUBLIC PARTICIPATION (52 FR 18738, May 19, 1987)

CYCLOHEXANE; PROPOSED TEST STANDARDS AND REQUIREMENTS (52 FR 19096, May 20, 1987)

CRESOLS; FINAL TEST STANDARDS AND REPORTING REQUIREMENTS (52 FR 19082, May 20, 1987)

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