



SPECIAL PROGRAMS NEWSLETTER

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

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A FAREWELL TO ARMS -- TOWARDS A CHEMICAL WARFARE TREATY

The U.S. Government has been involved for some years in international talks directed towards a chemical warfare disarmament treaty which would include a verifiable ban on production and stockpiling of chemical arms. The realization that certain key precursor chemicals and chemicals produced in large quantities could be diverted into chemical arms production now has refocused talks at the Conference on Disarmament in Geneva.

In 1984, the U.S. submitted a draft treaty to the Conference. The Treaty proposed requirements for stringent inspection and reporting procedures for facilities which handle these compounds, including mandatory on-site challenge inspections. Immediate issues arise, such as specific inspection procedures, criteria, and trade secrets protection. The U.S. chemical industry recently was asked to, "come to the aid of their State Department," and address specific details of the inspection program. DOS sought industry assistance to ensure that adequate consideration was given to the feasibility and propriety of inspections.

The Phosphorous Panel, consisting of five companies, was formed at CMA to undertake this task on a limited set of potential precursor chemicals. The Panel, chaired by Dr. Will Carpenter of Monsanto, held and arranged plant tours for DOS and Department of Defense officials. It currently is the indus-

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try contact point for DOS on the chemical arms issue.

So how would your company be affected? The lists of chemicals that trigger inspection and reporting requirements are ever changing. Many industrial chemicals are appearing on the lists, not simply phosphorous-based compounds. The result is your company may be subject to requirements without knowledge of the subsequent fate of its products.

To date, three lists have been drafted by DOS. The Agency feels that the

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listed chemicals pose a potential risk of misuse for weapons purposes. A proposed verification system would require special measures for these chemicals and production facilities, graduated according to the level of risk.

List I, very high risk toxic chemicals and precursors, would include only specifically named chemical warfare agents and their immediate precursors. None of the nine chemical agents on this list are now produced in significant quantities for commercial

List I. The production and use of these chemicals would be monitored by periodic international on-site inspections.

List III, high volume commercial chemicals, would include specific toxic chemicals and precursors which are produced in large quantities, and pose some risk of diversion to chemical weapons purposes. The production and use of these chemicals would be monitored only by data reporting.

*	*
* List II (High Risk Toxic Chemicals and Precursors)	
*	
* Chemicals with one phosphorous-methyl, -ethyl, or -propyl bond	*
* N,N-Dialkylphosphoramidic dihalides	*
* Dialkyl N,N-dialkylphosphoramidates	*
* Bis(2-hydroxyethyl)sulfide (thiodiglycol)	*
* Arsenic trichloride	*
* Phenyl-, alkyl- or cycloalkyl-substituted glycolic acids	*
* 3- or 4-hydroxypiperidine and their derivatives	*
* N,N-disubstituted aminoethyl-2-halides	*
* N,N-disubstituted aminoethan-2-ols	*
* N,N-disubstituted aminoethane-2-thiols	*
* List III (High Volume Commercial Chemicals)	
*	
* Phosphorus oxychloride	Trimethyl phosphite
* Phosphorus trichloride	Triethyl phosphite
* Phosgene	Dimethyl phosphite
* Cyanogen chloride	Diethyl phosphite
* Hydrogen cyanide	Sulfur monochloride
* Trichloronitromethane	Sulfur dichloride
* (chloropicrin)	

purposes nor would such production be allowed in the future.

More significant are Lists II and III (see box on this page). List II, high risk toxic chemicals and precursors, would include any commercial chemicals with a median lethal dose less than 0.5 mg/kg (rat, subcutaneous) and specific types of precursors for chemicals on

While much of this proposed program is in the development phase and the outcome uncertain, it is clear that some inspection and reporting requirements are sure to be part of the adopted treaty. If your company manufactures any chemical on Lists II and III, you should at least monitor developments closely. If you are able to be an active participant in shaping the industry and U.S. positions,

contact Dr. Robert Romano, Program Manager for the Phosphorous Program at 202/887- 1198, or Dr. Will Carpenter of Monsanto at 314/694-8880 for information on how to become involved.

SUPERFUND GETS SUPERCHARGED

It was down to the last wire, but the faltering Superfund program has not only been recharged, it's been "supercharged." The most comprehensive environmental legislation to date has been revitalized, renewed, and strengthened beyond the scope of the original Act. Not only does a stronger piece of legislation for hazardous waste investigations and cleanup now exist, the legislation is so broad that simple reference to a "Superfund amendment" is actually a misnomer.

Many of the provisions of the original Act have remained basically the same and will not be reviewed here. It is worthwhile, however, to note one area of change in Title I that is bound to have significant impact and dramatically increase the responsibility of the Agency for Toxic Substances and Disease Registry. A distinct entity under the U.S. Public Health Service, ATSDR was originally created by the enactment of CERCLA back in 1980. Somewhat similar in function to the Centers for Disease Control, and under the same director, ATSDR has now been brought into the limelight.

Under an expanded Title I, ATSDR is directed to be in the "list business." Within six months, the Agency must prepare a list, in order of priority, of the 100 chemicals most commonly found at waste sites on the National Priority List, and which are deemed to pose the most significant threat to human health. Within 24 months, this list is to be doubled, and then at least 25 additional chemicals must be added every twelve months, for three years.

What then is done with this list? For each chemical, the ATSDR must prepare a toxicologic profile and determine whether or not existing data are sufficient to adequately characterize the chemical. The Agency may determine that additional research is required, and it is directed to work with existing agencies under present regulations to develop the data. The most widely used Act for this purpose is the Toxic Substances Control Act, specifically Section 4. What this means is that a manufacturer, or possibly importer, of the chemical in question may be forced into footing the bill for whatever testing is required. What is not yet known are the criteria that the ATSDR will use in making its determinations and what role industry may play in the evaluation process.

Moving on to Title III, this section of the Reauthorization Act is actually a separate law and represents a new addition to our national policy on hazardous chemicals. Dealing primarily with the gathering and dissemination of information, Title III builds upon the existing OSHA Hazard Communication Standard and brings the concept of "right-to-know" out of the workplace and into the community at large. Appropriately entitled, "The Emergency Planning and Community Right-to-Know Act of 1986," it also sets up response programs for chemical emergencies.

Under Section 302 of Title III, EPA was required to list, complete with threshold quantities, chemicals for which reporting to an established State Commission will begin May 17, 1987. The list is the same as the list of 402 acutely toxic chemicals published by EPA in November 1985. Response is limited initially to notification; however, any information subsequently requested by the Commission must be supplied. Additionally, any facility which houses

or uses a chemical on the list above the threshold quantity must have a designated representative to handle such responsibilities by September 17, 1987. Failure to properly notify the Commission could result in a \$25,000/day fine.

Two other requirements of Title III involve the submission of Material Safety Data Sheets and inventory forms to established local and state groups, but, alas, there are no new lists for these chemicals. Instead, this requirement will pertain to any chemical which is subject to the requirements of the OSHA Hazard Communication Standard. The type of information that needs to be on the inventory forms includes an estimation of the amount of the chemical that is used or stored at a facility and the general location. Additional information, however, may be requested by local and state commissions, fire departments, and the public.

Information concerning chemical releases from industrial sites is required under Section 313 of Title III. The list of chemicals to which this applies is contained within the Section and forms are being prepared by EPA. Those facilities reporting that manufacture, process, or use a chemical on the Section 313 list above a designated quantity must complete the form. The information is submitted to EPA and designated state officials. The form requests information on the nature of the business, processes at the facility, the amount of the chemical present at any time, and the nature of disposal methods used. The annual quantity of that chemical entering the environment is also requested.

Cutoff limits for reporting are based on calendar year production, starting with 75,000 lbs./year if you manufacture/process a chemical on this list on or before July 1,

1988. The cutoff drops to 50,000 lbs. the following year, and then falls to 25,000 lbs./year thereafter. These requirements apply only to facilities in Standard Industrial Codes 20-39, ten or more employees. One of the things that EPA will use this information for is to establish a chemical data base which will be available to anyone on a cost reimbursable basis.

In order to aid in clarifying these as well as other provisions, new and old, of the Reauthorization Act, CMA will be holding a Superfund Implementation Workshop in the upcoming year (see Upcoming Events, this Newsletter).

REAUTHORIZATION OF SAFE DRINKING WATER ACT (June 19, 1986)

The 1986 Safe Drinking Water Act amendments, which were signed by President Reagan on June 19, 1986, include some changes that affect the chemical industry. The most significant change is the inclusion of a list of 83 chemicals, whose levels in drinking water must be regulated on a designated schedule. Nine chemicals must be regulated by June 19, 1987, 40 by June 19, 1988, and the remaining 34 by June 19, 1989. By January 1, 1988, and every three years thereafter, EPA will publish a list of additional chemicals for final regulation within three years of the publication date.

The regulation, known as a maximum contaminant goal, or MCL goal, must be set at a level at which there will be no known or anticipated adverse effects, with an adequate safety margin. The MCL will be based upon best available technology.

EPA can remove up to seven chemicals from the current list of 83 provided they are replaced by chemicals of higher priority. CMA's Environmen-

tal Committee is currently working on criteria for removal.

Chemicals on the list of 83 include vinyl chloride, benzene, chlorobenzene, polychlorinated biphenyls, adipates, dioxin, and styrene.

SPOTLIGHT: PHTHALATE ESTERS

The Phthalate Esters Program was formed in 1973 to address questions about environmental effects of phthalate esters. Alkyl phthalates and butyl benzyl phthalate were on the first and fourth Interagency Testing Committee lists, respectively, for development of environmental test rules under TSCA Section 4. The release in 1980 of a National Toxicology Program bioassay report on di-2-ethylhexyl phthalate, resulted in expansion of the Panel's activities to include both health and environmental effects. The bioassay showed that DEHP produced liver cancer in rats and mice fed high doses of the ester. The Panel is currently involved in an active advocacy program with three agencies -- EPA, FDA and the CPSC -- and has just completed a large health and environmental effects research program.

The Program currently includes five producer companies and seven raw material suppliers or user companies. Dean Finney of Eastman Chemical Company is Chairman of the Panel for 1987. James Quance of Exxon Chemical Americas was Chairman in 1985 and 1986. The three active task groups address environmental effects (Jeffrey Felder, Monsanto Company, Chairman), health effects (Eugene Barber of Eastman Kodak Company, Chairman), and food and drug applications (Eugene Skiest of Borden, Inc., Chairman).

The Panel's most recent accomplishment was a two-day symposium in Washington. Over 100 scientists from all over the world attended to

discuss the most recent research data on phthalate esters. The Symposium was convened to provide scientists at EPA, FDA and CPSC with an opportunity to learn about the most recent findings on phthalates so that any agency actions would reflect the current data.

Program Highlights:

- In 1982 the Panel negotiated the first voluntary testing agreement in lieu of a test rule under TSCA Section 4. The agreement contained extensive environmental and health effects research programs.
- The Panel completed a large environmental testing program in which 14 phthalate esters were tested for acute toxicity to aquatic organisms, chronic toxicity to Daphnia magna, and in a battery of physical-chemical and environmental fate tests. In 1987, the Panel will begin discussions with EPA on further environmental effects testing needs. If agreement can be reached, the testing could be conducted under a consent agreement.
- The Panel completed a health effects testing program in which DEHP and two of its metabolites, mono-2-ethylhexyl phthalate and 2-ethylhexanol, were tested in a battery of mutagenicity tests. Neither DEHP nor its metabolites were found to be positive in the Ames test, the mouse lymphoma forward mutation test, in vitro cell transformation or the unscheduled DNA synthesis assay. Eight additional phthalates were tested in the mouse lymphoma and transformation assays. All tested phthalate esters were negative in the transformation assay, and six of the eight were negative in the mouse lymphoma assay. Dimethyl

phthalate and dibutyl phthalate were positive in the mouse lymphoma assay, with activation.

- The Panel sponsored pharmacokinetic studies on DEHP aimed at understanding the results of the NTP bioassay and their relationship to man. In rats, increasing the dose and time of exposure to DEHP resulted in a metabolic shift to more oxidized metabolites. More importantly, the metabolic profiles at the higher doses, equivalent to the bioassay doses, were different from those at the lower, or likely exposure levels. In addition, there are significant differences in oxidative metabolites between rodents and primates.
- The Panel also sponsored studies on the liver effects of DEHP and seven other phthalate esters. At high doses, DEHP causes an increase in peroxisomes, an organelle found in liver cells. Several researchers have proposed that this increase leads to liver tumor development. Primates, including man, are not susceptible, or are much less susceptible to this toxic liver effect. If this mechanism is correct, there would be a threshold dose of DEHP, below which liver tumors would not develop. In addition, DEHP may be a carcinogen in rodents but not in man.
- The Panel filed comments on the Consumer Product Safety Commission's study on exposure to DEHP from children's products. The Panel pointed out the serious flaws in the design and conduct of the study. The Panel's comments and request to audit the studies lead to an audit by the Food and Drug Administration

which uncovered some of the same defects.

- The Panel designed and conducted a market survey to determine the levels of DEHP in milk, meat and cheese purchased from supermarkets around the United States. The results of the study lead FDA to conclude that there was no need for concern over the indirect food additive uses of DEHP.
- The Panel designed and is conducting studies on the pharmacokinetics and liver effects of di-2-ethylhexyl adipate. This program arose from FDA questions on a DEHA bioassay. DEHA continues as an indirect food additive while the Panel conducts research.
- The Panel submitted comments on the inclusion of three phthalate esters on the acute hazards list (Section 302, Emergency Planning and Community Right-to-Know). As a result, EPA has proposed to remove these phthalate esters from the list.
- The Panel filed comments with the NTP requesting removal of DEHP from the Fifth annual list of carcinogens. Removal would be based upon the likelihood that DEHP, although a rodent carcinogen, is not a carcinogen in man.

What does the future hold for the Phthalate Esters Program? In 1987, the Panel will try to reach resolution with EPA on the need for further health effects and environmental effects testing under TSCA Section 4. If discussions are fruitful, testing may be conducted under a consent agreement. Also, the Panel will continue to encourage regulatory agencies to use the results of its research programs to

ensure proper regulation of phthalate esters.

NEWS BRIEFS

HYDROQUINONE PANEL AND EPA SHAPE TEST RULE

(Washington, September 4) The Panel met with EPA to discuss comments on the proposed test standards for the TSCA Section 4 rule on hydroquinone. The Panel recommended amendments to update protocols for the test standards on developmental toxicity and reproductive effects. The Panel also recommended an additional in vitro dermal absorption test in the final test standards to establish the potential for absorption through the skin after dermal exposure. In the Panel's view, the proposed in vivo dermal study should only be required if the in vitro study demonstrates that there is a significant potential for penetration of the skin after dermal exposure. A final test standard rule for hydroquinone is anticipated in February 1987.

DIBENZOFURANS/DIBENZODIOXINS PANEL INTERACTS WITH NATO AND EPA

(Washington, September 15) Panel Chairman Dr. Kenneth Burgess of Dow attended a meeting of the NATO Committee on the Challenges of Modern Society. Representatives from the German VCI and CMA were invited to the meeting as observers. The CCMS is striving to reach international consensus on assessing risks of exposure to dioxins. Dr. James Wilson of Monsanto will represent CMA as an observer on a subgroup which will consider the use of toxicity equivalency factors in risk assessment.

Dr. Wilson also represented the Panel at two EPA Science Advisory Board subcommittee meetings in September. His presentations high-

lighted the Panel's comments on the EPA Health Assessment Document on Dibenzofurans and EPA's TEF Scheme for risk assessment (see this Newsletter, Recent Releases section).

EPA DECLINES TO REGULATE NICKEL COMPOUNDS AS AIR TOXICS

(Washington, September 25) EPA has concluded that, although nickel subsulfide and nickel carbonyl have been classified as known or probable human carcinogens, Federal regulation under the Clean Air Act is not necessary to protect public health. The decision was based on a determination that, due to lack of human exposure, these compounds pose no significant health risk. The Agency will defer a decision on other nickel compounds until the results of continuing research studies are known.

STUDIES COMPLETED ON NICKEL CATALYSTS

(Washington, October 3) American Cyanamid Company has completed three studies on health effects of its nickel catalysts. The studies included skin sensitization, lung toxicity, and a cell transformation assay. Results of these studies were presented to the Metal Catalysts Panel, of which American Cyanamid is a member. The Panel now is developing additional research programs based on the results of these studies.

PHthalate ESTERS PANEL BRIEFS EPA

(Washington, October 7) A special scientific briefing requested by EPA's Health and Environmental Review Division was given by members of the Panel and its Toxicology Research Task Group. The briefing focused on recent health effects research sponsored by the Panel as part of a negotiated testing program with the Agency. EPA now must review and evaluate all the data that the Panel has submitted.

Decisions on requirements for any further testing will follow this task.

CYCLOHEXANE NEGOTIATIONS CLOSE

(Washington, October 9) EPA informed the Cyclohexane Panel that it has not received adequate evidence to rebut the TSCA Section (4)(a)(1)(B) finding that there is, or may be, substantial human exposure to cyclohexane. Also, EPA decided to conclude consent agreement negotiations. The Panel believes that the unsuccessful negotiations were nevertheless useful as a means of providing early technical input to EPA. The Panel plans to sponsor a market research survey to further document the miscellaneous uses and potential exposures to cyclohexane. EPA has begun drafting a proposed test rule for publication by May 1987.

OCTYLPHENOL PANEL SUBMITS ENVIRONMENTAL STUDY

(Washington, October 10) The Panel submitted to EPA a final report on results of an environmental effects study. This completes work under a negotiated testing agreement between EPA and the Panel. The study, which involved early-life-stage rainbow trout, indicates that the maximum acceptable toxicant concentration range is between the mean measured octylphenol concentrations of 0.0061 mg/l and 0.011 mg/l. The measured concentration of 0.0061 mg/l was the No Observed Effect Level.

EPA ADDS CHEMICALS TO DIOXIN RULE

(Washington, October 23) EPA amended a section of its TSCA Section 4(a) proposed rule containing testing and reporting requirements for polyhalogenated dibenzodioxins/dibenzofurans. The amendment added 18 chlorinated and brominated benzenes to the list of 12 precursor chemicals in the proposal for which reporting would be required.

The Dibenzofurans/Dibenzodioxins Panel did not object to the additions in its comments to the Agency (see this Newsletter, Recent Releases section). However, given the manufacturing processes involved in the production of these precursors, the Panel expressed doubt that dioxins/furans would be generated. A final test rule is expected in the first quarter of 1987.

MESITYL OXIDE COURT ACTIONS INTENSIFY

(Washington, October 31) The Fifth Circuit Court has denied the mesityl oxide producers' motion to supplement the record before the Court with information related to TSCA Section 21 proceedings. Elsewhere, an EPA motion to stay proceedings in the U.S. District Court was granted. The District Court challenge was filed by the producers, who are members of the Ketones Panel, following EPA denial of a Section 21 petition to withdraw the mesityl oxide test rule. With the stay granted, activity will center in the Fifth Circuit. The Natural Resources Defense Council has intervened in both courts. Filing of an amicus curiae brief by the American Petroleum Institute is anticipated.

PCBs MEET SOLID WASTE

(Washington, November 6) The PCB Panel hosted a meeting with the Director of EPA's Office of Solid Waste, Marcia Williams. Representatives of the utility and electrical equipment industries also attended. Williams outlined the Agency's plans to transfer responsibility for PCB storage and disposal regulations from TSCA to RCRA. Industry is dedicated to helping EPA develop a useful regulation that can be smoothly implemented. The Panel plans to actively participate in the transition working groups that EPA will convene in the first quarter of

1987. The groups will look at permitting rules, recordkeeping requirements, corrective action rules, incinerator standards, concentration limits, and other issues.

ETHYLHEXANOIC ACID PANEL CONFRONTS FINAL TEST RULE

(Washington, November 6) EPA published a Final test rule under TSCA Section 4 that requires 90-day subchronic toxicity, developmental toxicity and pharmacokinetics studies of 2-ethylhexanoic acid. The Panel plans to file a petition for judicial review of the rule and also will request a stay of the rule's effective date.

EFFECTS OF OZONE CHANGES DISCUSSED

(Amersfoort, The Netherlands; November 19) A delegation of Fluorocarbon Panel representatives, led by Dr. Gordon Diprose of ICI, participated in a meeting of the Co-ordinating Committee on the Ozone Layer. CCOL, sponsored by the United Nations Environment Programme, met to discuss the results of recent research into the effects of ozone layer change and UV-B flux on crops, animal life, materials and humans. The group plans to publish proceedings from the meeting early in 1987.

ISOPROPANOL PRODUCERS AND EPA MEET . . . EVENTUALLY

(Washington, December 5) The Interagency Testing Committee, in its 19th Report, has added isopropanol to the list of priority chemicals for consideration by EPA for testing under TSCA Section 4. The ITC recommends chronic toxicity studies, including an assessment of carcinogenicity, and tests to assess mutagenic and clastogenic potential in mammalian systems. High production volume and widespread workplace and consumer exposure are cited as the basis for concern.

EPA cancelled its Public Focus Meeting on isopropanol scheduled for December 16. A meeting to discuss the initial reactions of EPA and industry to the recommendations has been deferred by the Agency until an unspecified date in January. Isopropanol producers met in December at CMA to discuss issues raised in the ITC Report and develop a strategy for subsequent activities. A Special Program Panel has been formed. Contact Kathryn Rosica of the Special Programs Division at 202/887-1314 for further information.

NEW PROGRAMS

ETHYLHEXANOL PANEL FORMS

The producers, importers and users of 2-ethylhexanol have formed a panel at CMA to interact with EPA on development of a test rule. Member companies include Eastman Chemical Company, Exxon Chemical Americas, BASF Corporation, Monsanto Company, Aristech Chemical Corporation, Shell Chemical Company, Nuodex (Huls), and Union Carbide Corporation.

2-EH, originally the subject of an NTP-sponsored chronic bioassay, came to EPA's attention when budget cuts forced NTP to drop the bioassay from its program. The Agency therefore decided to use the provisions of TSCA Section 4 to require industry to conduct the test.

Test rule activity was initiated by EPA in August 1986. A proposed rule was planned to be published by January 1987, and a final rule by June 1987. Once the bioassay was underway, EPA planned to propose a second test rule to cover any other testing that might be needed.

Under the leadership of Dean Finney (Eastman Chemical Company), the Panel entered into negotiations with EPA to investigate development of a test program under the consent

agreement procedure. Rather than the traditional bioassay protocol, the Panel proposed to EPA that an expanded assay be performed to include biochemical parameters, time-course studies and recovery groups. The Panel intended to conduct this investigation in one species, the rat, and NTP would conduct parallel testing in the mouse. Although EPA and NTP agreed with the concept of a collaborative research program, negotiations broke down over disagreement on the chemicals to be tested, route of administration, and the need to understand mechanism. A proposed test rule requiring a chronic bioassay in two species was published December 19, 1986.

PEOPLE

PHthalate Esters Panel CHANGES LEADERSHIP

Dean Finney, (Eastman Chemical Company) was elected chairman of the Phthalate Esters Panel after completing a two year term as the Vice Chairman. Jeff Felder (Monsanto Company) was elected the new Vice Chairman. Mr. Felder will also continue to chair the Environmental Research Task Group. James Quance, (Exxon Chemical Americas) was Chairman in 1985 and 1986. Thank you to Jim for his excellent leadership, and good luck to Dean and Jeff.

2-ETHYLHEXANOL Panel ELECTS NEW CHAIRMAN

Richard Wise (Union Carbide Corporation) was elected chairman of the 2-EH Panel at their December 15, 1986 meeting. Dick replaces Dean Finney (Eastman Chemical Company), who chaired the Panel since its formation in August 1986. Thank you to Dean for his outstanding leadership during the formation of the Panel, and good luck to Dick.

PHOSGENE Panel ELECTS NEW CHAIRMAN

W. E. Irby, Manager of Health and Environmental Safety for Mobay Corporations' Baytown, Texas plant, was elected Chairman of the Phosgene Panel at the Panel's semi-annual meeting, on October 22-23. He replaces Wiley Barton of Dow Chemical Company, who was promoted to Director of the company's North Haven, Connecticut Plant Lab.

Barton had chaired the Panel since 1983. We will miss him, and congratulate him in his new position and location. Congratulations as well go to Buddy Irby as the new chairman. We look forward to working with him in the future.

EOIC Task Group HAS NEW LEADER

At the November 10 meeting of the Ethylene Oxide Industry Council's Industrial Hygiene Task Group, Thomas Grumbles of Vista Chemical Company replaced Wesley Jordon of Becton Dickinson as leader of the newly reorganized group. We thank Wes Jordon for his past leadership and look forward to further success with Tom Grumbles.

RECENT RELEASES

FEDERAL REGISTER NOTICES

NINETEENTH REPORT OF THE INTERAGENCY TESTING COMMITTEE TO THE ADMINISTRATOR; RECEIPT AND REQUEST FOR COMMENTS REGARDING PRIORITY LIST OF CHEMICALS (51 FR 41417-41432, November 14, 1986)

TESTING AND REPORTING REQUIREMENTS FOR POLYHALOGENATED DIBENZO-P-DIOXINS/DIBENZOFURANS; ADDITION OF CHLORINATED AND BROMINATED BENZENES TO LIST OF PRECURSOR CHEMICALS (51 FR 37612-37613, October 23, 1986)

ASSESSMENT OF NICKEL SUBSULFIDE AND NICKEL CARBONYL AS POTENTIAL TOXIC

AIR POLLUTANTS (51 FR 34135, September 25, 1986)

EPA FINAL TEST RULE FOR 2-ETHYLHEXANOIC ACID (51 FR 40318, November 6, 1986)

2-Ethylhexanol: PROPOSED TEST RULE (51 FR 45487, December 19, 1986)

SPECIAL PROGRAMS COMMENTS

Comments to the UNEP Co-ordinating Committee on the Ozone Layer: FLUOROCARBON PROGRAM PANEL SUMMARY ON RECENT RESEARCH RESULTS AND ASSESSMENT OF EFFECTS OF OZONE LAYER CHANGE AND UV-B FLUX
(filed by the Fluorocarbon Panel, November 14, 1986)

Comments to the SAB Stratospheric Ozone Subcommittee: CRITIQUE OF THE EPA DOCUMENT: AN ASSESSMENT OF THE RISKS OF STRATOSPHERIC MODIFICATION
(filed by the Fluorocarbon Panel, November 24, 1986)

Comments to EPA: CONSENSUS GROUP PROPOSAL ON PCB SPILL CLEANUP REQUIREMENTS
(filed by the PCB Panel, October 14, 1986)

Comments to the International Agency for Research on Cancer: EVALUATION OF POLYCHLORINATED BIPHENYLS FOR GENETIC ACTIVITY
(filed by the PCB Panel, October 8, 1986)

Comments to the International Agency for Research on Cancer: GENOTOXIC EFFECTS OF PCBs
(filed by the PCB Panel, October 8, 1986)

Comments to the Organization for Economic Cooperation and Development: CONCERTED ACTIONS ON SPECIFIC CHEMICALS: POLYCHLORINATED BIPHENYLS
(filed by the PCB Panel, November 18, 1986)

Comments to OSHA on the PROPOSED AGENDA AND GROUND RULES FOR THE NEGOTIATED RULEMAKING FOR 4,4'-METHYLENEDIANILINE
(filed by the MDA Panel, July 11, 1986)

Comments to OSHA on the MDA NEGOTIATED RULEMAKING: RESPONSE TO OSHA'S PROPOSAL AND SUBMISSION OF ALTERNATIVE PROPOSALS
(filed by the MDA Panel, July 21, 1986)

Comments to OSHA on the MDA NEGOTIATED RULEMAKING: RESPONSE TO OSHA'S PROPOSAL AND SUBMISSION OF ALTERNATIVE PROPOSALS
(filed by the MDA Panel, August 4, 1986)

Comments to the EPA on the HEALTH ASSESSMENT DOCUMENT FOR POLYCHLORINATED DIBENZOFURANS
(filed by the Dibenzofurans/-Dibenzodioxins Panel, August 22, 1986)

Comments to the EPA on EPA'S TOXIC EQUIVALENCY FACTOR (TEF) SCHEME FOR PREDICTING RISKS FROM CHLORINATED DIBENZODIOXINS AND DIBENZOFURANS.
(filed by the Dibenzofurans/-Dibenzodioxins Panel, August 25, 1986)

Comments to the EPA on a PROPOSED TESTING PROGRAM FOR 2-ETHYLHEXANOL
(filed by the 2-Ethylhexanol Panel, September 9, 1986)

Comments to the EPA on a PROPOSED TESTING PROGRAM FOR 2-ETHYLHEXANOL
(filed by the 2-Ethylhexanol Panel, September 29, 1986)

Comments to OSHA in RESPONSE TO OSHA RISK ASSESSMENT AND PROPOSALS FOR MEDICAL SURVEILLANCE, BIOLOGICAL MONITORING, REMOVAL AND RATE RETENTION
(filed by the MDA Panel, October 2, 1986)

Comments to the EPA on NEGOTIATIONS
TO DEVELOP A TESTING CONSENT AGREEMENT
ON 2-ETHYLHEXANOL

(filed by the 2-Ethylhexanol
Panel, October 2, 1986)

Comments to the CALIFORNIA DEPARTMENT
OF FOOD AND AGRICULTURE ON THE
REPLY TO CLAIMS FOR FORMULATORS
EXEMPTION (CA Notice 86-5)

(filed by the Biocides Panel,
October 14, 1986)

Comments to the EPA on NEGOTIATIONS
TO DEVELOP A TESTING AGREEMENT ON
2-ETHYLHEXANOL

(filed by the 2-Ethylhexanol
Panel, October 20, 1986)

Comments to OSHA on MDA MEDIATED
RULEMAKING -- ISSUES TO BE CONSIDERED
AT NOVEMBER MEETING

(filed by the MDA Panel November
13, 1986)

Comments to the EPA on the AMENDED
TESTING AND REPORTING PROPOSAL FOR
POLYHALOGENATED DIBENZODIOXINS/-
DIBENZOFURANS

(filed by the
Dibenzofurans/Dibenzodioxins
Panel, November 24, 1986)

COMMENTS TO THE NTP ON THE PORTIONS
OF THE FOURTH ANNUAL REPORT ON CAR-
CINOGENS RELATING TO DEHP

(filed by the Phthalate Esters
Panel, November 28, 1986)

FINAL REPORTS

1. Early Life Stage Toxicity of para-tert-octylphenol to Rainbow Trout (Salmo gairdneri) in a Flow-Through System (Octylphenol Panel).
2. Triethylene Glycol Ethers: Absorption Through Human Epidermis In Vitro (Glycol Ethers Panel)
3. Triethylene Glycol Ethers: An Evaluation of Teratogenic Potential and Developmental Toxicity

Using an In Vivo Screen in
Rats (Glycol Ethers Panel)

4. 21-Day Dermal Toxicity Study in Rabbits-Limit Test With Triethylene Glycol Monobutyl Ether (TGBEE), Triethylene Glycol Monoethyl Ether (TGEE) and Triethylene Glycol Monomethyl Ether (TGME) (Glycol Ethers Panel)
5. Disposition of 2-Mercaptobenzothiazole-Ring-UL-14C and 2-Mercaptobenzothiazole Disulfide-Ring-UL-14C in Fischer 344 Male and Female Rats Dosed Orally (Rubber Additives Panel)
6. Disposition of 2-Mercaptobenzothiazole-Ring-UL-14C and 2-Mercaptobenzothiazole Disfiguring UL-14C in Fischer 344 Male and Female Rats Dosed Intravenously (Rubber Additives Panel)
7. Mutagenicity of 1A (Dimethyl Phthalate) in a Mouse Lymphoma Assay (Phthalate Esters Panel)
8. Mutagenicity of 1C (Di-N-Butyl Phthalate) in a Mouse Lymphoma Assay (Phthalate Esters Panel)
9. Mutagenicity of 1D (Butyl Benzyl Phthalate) in a Mouse Lymphoma Assay (Phthalate Esters Panel)
10. Mutagenicity of 1G (Di-N-Hexyl, N-Octyl, N-Decyl) Phthalate in a Mouse Lymphoma Assay (Phthalate Esters Panel)
11. Analysis of bis(2-Ethylhexyl) Phthalate (DEHP) by Gas Chromatography--Mass Spectrometry in Dairy and Meat Products (Phthalate Esters Panel)
12. Hepatic and Lipid Effects of Peroxisome Proliferation (Phthalate Esters Panel)

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UPCOMING EVENTS

AIR TOXICS POLICY IMPLEMENTATION WORKSHOP

CMA will present a two-day workshop on air toxics policy implementation, emissions inventories and assessments, January 13-14, 1986, at the Hyatt Regency Atlanta. The workshop is designed to provide information that will assist member companies in the implementation of an air toxics control program. For further information, contact Barbara Long at 202/887-1183.

COMMUNICATIONS WORKSHOP ON AIR TOXICS

CMA will hold a one-day "hands on" workshop on communication of air toxic issues, January 20, 1987, at the Hotel Intercontinental in Houston, Texas. Designed specifically for those working on air toxics control, participants themselves will work through the steps needed to develop a community action plan for their own facilities. For more information, contact Robin Howe at 202/887-1215.

SUPERFUND IMPLEMENTATION WORKSHOP

CMA will present a two-day workshop on Superfund implementation on January 28-29, 1987, at the Royal Sonesta Hotel, in New Orleans, Louisiana. The workshop will focus on the most important requirements of the new Superfund including an in-depth review of company responsibility under Title III. For more information, contact Hilary Goldmann at 202/887-1173.

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