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RECEIVED

Date January 19, 1978

JAN 24 1977

Subject

Background for Items on Agenda

INTEROFFICE
MEMORANDUM

LAW DEPT.

TSCA Meeting - January 30, 1978

To TSCA Compliance Committee

From C. E. Blades

(Location, Organization, or Department)

Piscataway

(Location, Organization, or Department)

1. Substantial Risk Notification

See Appendix A for final draft of Notice to Employees.
Each member of committee please be prepared to identify recipients of the notice.

2. Budget & Cost Gathering Report

Presentation by H. W. Parke.
See Appendix B for outline of presentation.

3. Product File

Progress report on Raw Materials Inventory
Update on Product File -- Appendix C.

T. C. Collins

4. Review on Chemical Substances Inventory--Dec 23, 1977

Timetable -- Appendix D
TSCA Bulletin 45

E. I. Handwerk

5. Key Events for TSCA 1978

Timetable, Appendix E

C. E. Blades

6. Member Assignments

Appendix F

C. E. Blades

7. Significant Adverse Reactions Directive

Appendix G

C. E. Blades

CEB:sk
Attachments


C. E. Blades

cc: W. M. Smith	A. J. Diglio	E. I. Handwerk	H. W. Parke
R. H. Schenck	W. Ent	M. G. Zellner	T. C. Collins
L. B. Tepper	G. Handley	J. H. Body	J. Egan
J. C. Novak	R. Collins	A. I. Dalton	J. Urenovitch

(320)

AP00049067

January 19, 1978

APPENDIX A

DIRECTIVE ON
SUBSTANTIAL RISK NOTIFICATION

The Toxic Substances Control Act, signed in October 1976, became effective January 1, 1977. One of the features of the Act which became effective on January 1, 1977 is contained in Section 8(e) known as "Substantial Risk Notification". As passed by the Congress, any person engaged in the manufacture, processing, or distribution of chemical substances, who obtains information which supports the conclusion that substantial risk to human health or the environment exists, is required to notify the Environmental Protection Agency immediately of such risk.

Referring to APCI's Standard Practice No. 702A, p. 5, and to directions given at the training sessions on TSCA compliance, the company procedure for dealing with matters of potential "substantial risk" is given. It is reproduced here.

"The Company is required to inform the EPA immediately if it obtains any information which reasonably supports the conclusion that one of its chemical products presents a substantial risk of injury to health or the environment. Anyone in the Company obtaining such information shall immediately forward it through the appropriate line management to the Group/Division Manager with environmental responsibility and to the TSCA Chairman who, along with the committee and appropriate management, shall evaluate the degree of risk presented."

The purpose of this present notice is to advise APCI employees of a revision in the Company procedure for compliance with TSCA-Section 8(e), Substantial Risk Notification. The following directions are to be followed in all sectors of the company:

AP00049068

- (1) All employees capable of appreciating pertinent information relative to substantial risk are required to notify their line supervisor immediately* in writing, with a copy to the TSCA Compliance Chairman (C. E. Blades). Such written notification shall be followed by documentation with attached reports describing the information which leads to a potential conclusion of substantial risk to health or the environment.
- (2) Beginning January 1, 1978, all orders for toxicological testing are to be placed through the TSCA Chairman's office. Reports of results, the management of toxicological testing contracts, and the responsibility for evaluation and pertinence of testing will reside with C. E. Blades and the TSCA Compliance Committee.

For your guidance, we summarize below the types of information which could lead to a Substantial Risk Notification.

- (1) Demonstrated instances (or a series of events in a pattern which lead to a conclusion of a relationship) in which a product produces cancer, gene mutations, birth defects, death, or serious prolonged incapacitation in humans.
- (2) Epidemiological studies, bioassays (in vitro or in vivo) which would reasonably support the conclusion of substantial risk of injury to human health or the environment when levels of exposure and degree of toxic hazard are taken into consideration.
- (3) Information which illustrates:
 - (a) Organic chemicals with extreme persistence or non-biodegradability (excludes inorganic materials).
 - (b) Pronounced bioaccumulation (e.g., 50,000 X in 30 days for fish)

* Immediately means within 1-2 days after the information is received.

or >10,000 partition coeff. with n-octanol/water).

- (c) Interference with biogeochemical cycles (e.g., kills or inhibits nitrifying bacteria).
 - (d) Stimulates primary producers (e.g., algae, macrophytes) in aquatic ecosystems. (e.g., excessive discharge of phosphates into natural waterways can stimulate algae growth which, in turn, depletes oxygen levels in the water and adversely affects other life.)
 - (e) Any observed acute or chronic toxicity effects relating to cancer, mutations of genes, or birth defects, or serious harm to health in non-human organisms.
 - (f) Facile metabolism or degradation to a chemical product with any of the above.
- (4) Emergency incidents, such as spills or releases, which because of the extent of the contamination, critically imperils a human population and critically threatens other life forms with significant population destruction.

R. Fleming

AP00049070

December 12, 1977

Labor Distribution of C.E. Blades

& Staff on TSCA Matters - W.O. #FL-0008

H. W. Parke

Trexlerstown

C. E. Blades

Piscataway

Pertinent to the distribution of TSCA costs from Dept. 641-4040,
I propose the following revision:

IGD	1%
MSD	1%
CSD	3%
MPD	1%
Specialty Gases	14%
Industrial Chem. R&D	25%
Polymers R&D	3%
Ammonia Prod. R&D	5%
Chemical Add. R&D	20%
Acetylenics R&D	15%
Process & Catalysts	10%
PVC R&D	2%

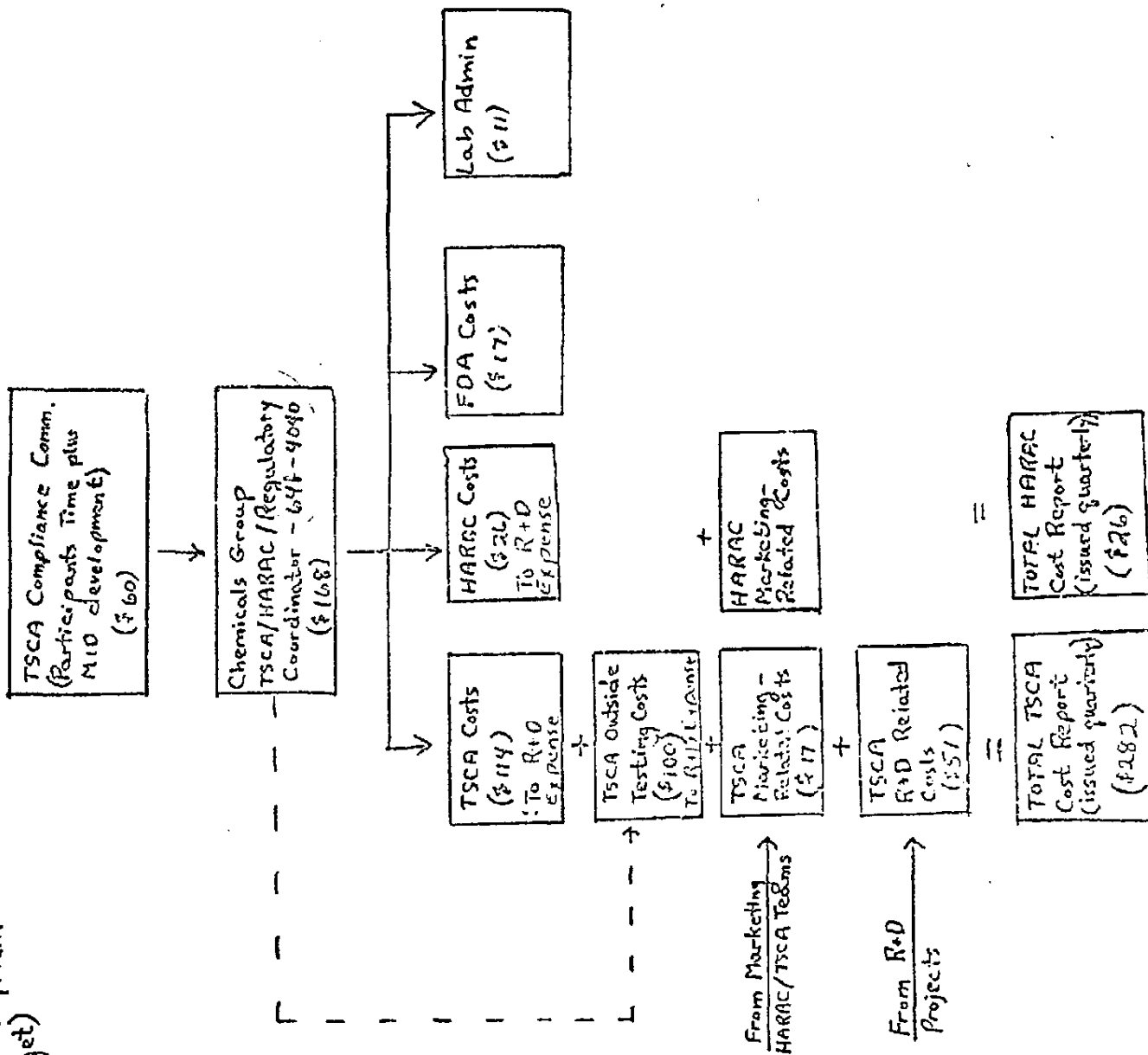
CEB:sk

C. E. Blades

cc: B. Horton

AP00049071

TSCA Cost Collection System
(\$000 FY 78 Budget)



MD 11/8/77

AP00049072

EXHIBIT II

TSCA Costs By Profit Center
Budget FY 1978

(\$000)

<u>To Profit Centers</u>	<u>From Coordinator's Office</u>	<u>From Outside Testing</u>	<u>From Profit Center Marketing</u>	<u>From Profit Center R&D</u>	<u>Total</u>
Processes & Catalysts	\$ 11	\$ -	\$ -	\$ -	\$ 11
Chemical Additives	23	67	-	26	116
Acetylenics	17	-	-	-	17
Polymers	2	33	-	25	60
Industrial Chemicals	29	-	9	-	38
Ammonia	6	-	-	-	6
Plastics	2	-	1	-	3
Fabricated Plastics	1	-	-	-	1
Specialty Gas	<u>23</u>	<u>-</u>	<u>7</u>	<u>-</u>	<u>30</u>
TOTAL	<u>\$114</u>	<u>\$100</u>	<u>\$17</u>	<u>\$51</u>	<u>\$282</u>

HWP/dls
11/10/77

AP00049073

CHEMICAL SUBSTANCE DATA SHEET

PRODUCT NAME

PRODUCTION LOCATION

VOLUME

PRODUCT USES

METHOD OF DISPOSAL

EMPLOYEES EXPOSED

PUBLIC EXPOSED

CHEMICAL IDENTITY

NAME

STRUCTURE

CAS

Z

IMPURITIES

BY-PRODUCTS

INTERMEDIATES

RAW MATERIALS

AP00049074