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"Within the USDA," he explained, "policy decisions have been made relative to pest management techniques which are worthy of investigative research." "But at the same time," he added, "another branch has chosen to promote the principle in such a way that a large portion of the public sector is led to believe that the promise is reality. Recognized techniques of proven value are held in disfavor with the result that regulations have removed them from consideration by agriculturalists who might choose to use them to increase their yields of food crops destined for consumers."

Brinkley called for studies at all levels of the impact of regulatory agencies of government on production and the confidence of manufacturing institutions.

Charles J. Carey, President, National Canners Association, also hit at the burden being caused by the cumulative effects of the increasing numbers of federal regulations "which impose a burden that the economy cannot reasonably be expected to carry." The most burdensome of these must be modified or stretched out, he said. Specifically, he urged, "the pesticide applicator certification program of FEPCA and the deadline for reregistration of pesticides by EPA should be deferred so as to postpone the added costs that will necessarily result."

He proposed that Congress might establish a mechanism -- a Consumer Cost Evaluation Act -- by which the consumer cost of any proposed program can be evaluated in terms of the real cost to the economy.

Robert C. Liebenow, President, Corn Refiners Association, called for "a serious review of government regulatory procedures in all areas which affect the cost of production and productivity." In many areas, including pesticide chemicals, he said, "we may be confronting decisions on actions which may be desirable in themselves but not vital to the Nation's immediate health and safety." When deciding whether to take an environmental or pesticide action now -- or at some time in the future when its cost could be better absorbed -- administrators could be better told to add extra weight in the decision to give credit for inflation control, Liebenow said.

Restrictions on the use of selected insecticides have lead to increased costs. Dr. Arlie Bowling of the National Cotton Council told the Chicago conference. He pointed to increased costs resulting from restrictions on organochlorine and DDT.

TRAIN ORDERS IMPLEMENTATION OF ALL VINYL CHLORIDE TASK FORCE RECOMMENDATIONS

All 19 of the recommendations of the Environmental Protection Agency's vinyl chloride task force recommendations are being implemented by the agency (See Sept. 4, Page 2). The majority of the recommendations urged more research. The task force made four recommendations to industry.

The first recommendation to EPA calls for a vinyl chloride air pollution emission standard. To establish the standard, EPA is expected to declare vinyl chloride a hazardous pollutant and to proceed under Section 112 of the Clear Air Act.

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At this time, EPA apparently does not have sufficient data to set a finite standard. A working draft of alternatives for vinyl chloride air emission regulation noted that "the available evidence, though not sufficient for establishing precise quantitative ambient air levels at which human health effects will occur, does demonstrate conclusively that vinyl chloride can cause serious adverse health effects, and that emissions therefore should be controlled to minimize the risk to public health."

This means that EPA will probably not set a finite standard but will require industry to use the "best available control technology" to reduce emissions to the lowest practicable level. The agency could also establish equipment standards to enforce control of vinyl chloride emissions.

But, an EPA official said, a finite standard might be set if new data indicated that this was practical and necessary and if the Occupational Safety and Health Administration (OSHA) adopted a finite standard based on more definitive health effects information than is presently available.

Some EPA officials feel that the currently available vinyl chloride health effects data is sufficient to declare vinyl chloride a "hazardous pollutant" but not to set a safe ambient air exposure level.

The working draft said "development of background data and establishment of standards could be accomplished in approximately 12 months. Scientific judgment indicates that the levels of vinyl chloride which would be achieved by requiring best available control technology would present no established risk to public health or welfare."

Requiring use of the best available control technology can reduce vinyl chloride emissions from vinyl chloride plants by as much as 90% and from polyvinyl chloride plants by as much as 75%, according to EPA.

These control systems, the working draft noted, "can be phased in with some controls being effected within 6 months and the entire system operational in about 2 years."

The draft estimated that the use of the controls would increase the selling price of polyvinyl chloride by 4%. The controls would increase the cost of producing vinyl chloride by about 1% and polyvinyl chloride by about 3.5%, the draft said. It stated:

"The capital cost of these controls to industry is estimated at \$75.6 million for the polyvinyl chloride industry and \$7.7 million for the vinyl chloride industry

"Nineteen of 22 firms that produce polyvinyl chloride and all 10 firms that produce vinyl chloride would be relatively unaffected by the requirement to add emission controls.

"The remaining 3 polyvinyl chloride firms probably would experience difficulty in raising the capital required to purchase control systems necessary to implement best available technology. As a result, these firms could be forced to close their plants ...

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"Based on industry responses obtained from EPA requests for information and meetings with selected companies, producers of vinyl chloride monomer and polyvinyl chloride have incurred capital expenditures of \$9 million to date for reducing vinyl chloride losses and will incur additional capital expenditures of \$4 million in the near future."

The draft's summary of air emissions around plants noted that between 90% and 97% of the emissions were less than 1 p.p.m. The draft said that "around polyvinyl chloride plants, peak concentrations of up to 33 p.p.m. were measured. Outside the immediate vicinity of plants (beyond 5 miles), concentrations were below detectable levels."

According to the working draft, "about 90 percent of the total vinyl chloride emissions in the U. S. emanate from the polyvinyl chloride plants. Vinyl chloride monomer plants are responsible for less than 10 percent of total emissions and the remaining emissions of vinyl chloride are from fabricating plants. On a plant-by-plant basis, vinyl chloride monomer plants emit about one third as much vinyl chloride as do polyvinyl chloride plants."

EPA Administrator Russell E. Train said the agency's and OSHA's standard would probably require a number of the same control measures.

Train emphasized that "there is no scientific evidence to indicate that vinyl chloride emissions into the atmosphere pose an imminent hazard to people living near the plants. It is clear, however, that some hazard does exist and that our population deserves the protection afforded by regulatory action."

The Administrator said he would expedite the air emission standard setting process as much as possible.

Task Force Makes 12 Research and 4 Industry Recommendations

The vinyl chloride task force recommendations focused on research and monitoring: (1) More ambient air monitoring; (2) material balance studies and identification of vinyl chloride leakage points; (3) determination of vinyl chloride background levels in the ambient air, indoors and outdoors due to the presence of polyvinyl chloride products; and (4) monitoring drinking water near polyvinyl chloride plants.

(5) Study the amount of vinyl chloride migration out of polyvinyl chloride products used in water distribution systems; (6) development of a standard method for monitoring vinyl chloride levels and study of the possibility of developing continuous air monitoring devices; (7) determination of the hazard of waste from plants and disposal of polyvinyl chloride consumer products; (8) support for planned vinyl chloride toxicological studies; (9) support for planned vinyl chloride epidemiological studies; (10) studies on the behavior of vinyl chloride in air and water; (11) development of laboratory procedures for safe handling of vinyl chloride; and (12) identification and analysis of other "high volume chemicals" which might need additional testing or controls.

In its recommendations to industry, the task force urged prompt use of operating and maintenance procedures in advance of government regulatory actions.

The second recommendation to industry called for a monitoring system at the fence line and beyond to help ascertain "the nature of pollutants reaching nearby neighborhoods."

Industry should expand its efforts in analysis of the rates of release of vinyl chloride monomer from polyvinyl chloride products and determine, and report to purchasers, the levels of unreacted vinyl chloride monomer in all grades of polyvinyl chloride resin, the task force said.

The final industry recommendation urged the Manufacturing Chemists Association to consult with interested government agencies in a reevaluation of its planned vinyl chloride toxicological experiments "at low doses to insure that the design is (a) statistically reliable, and (b) relevant to the ambient air concerns of EPA." The task force report said:

"Since carcinogens are generally considered not to have a 'no effects' threshold level, there should be concern with possible risks to health at even the lowest levels of exposure to VC which are encountered in the ambient air, and possibly in water."

This assertion or observation was repeated throughout the report. In the opening of the report's discussion of vinyl chloride health effects, it was noted that there was no direct evidence of these effects on man "at the levels of exposure that have been or are likely to be encountered outside the workplace; however, the two recently reported non-occupational cases of angiosarcoma of the liver in neighborhoods near PVC fabrication plants suggest the possibility that there may be a correlation between the incidence of angiosarcoma and low levels of exposure ... Given the previous lack of effort to search for effects at low doses, it seems prudent to assume that there probably is not a no-effects threshold for VC, and there should be concern about the possible health effects at any level of exposure."

This assumption does not appear to be completely consistent with EPA's present plan to simply attempt to reduce vinyl chloride ambient air levels to amounts "which present no established risk to health or welfare" without setting a finite maximum exposure limit.

FINAL SECTION 8 REGULATIONS REFLECT COMPROMISE ON "SENSITIVE RECORDS"

The preamble of the final Books and Records regulations, Section 8, which are scheduled to appear in the Federal Register this week or early next week, allows for certain particularly sensitive records to be inspected only with the prior approval of the Regional Administrator for the region in which the inspection is to take place. This position reflects a compromise between EPA and the Office of Management and Budget and the Commerce Department, and EPA official said (See Sept. 11, Page 2).