CHEMICAL MANUFACTURERS ASSOCIATION

July 31, 1987

TO HEALTH AND SAFETY CONTACTS OF CMA MEMBER COMPANIES

Dear Health and Safety Contact:

As you know from my letter to you of May 11, 1987, the health-related authorities of the Superfund Amendments and Reauthorization Act (SARA) of 1986 will have a significant impact on your company. I alerted you to CMA's intentions to begin various advocacy activities to cooperate with and promote sound science during government implementation of Section 110 of SARA. Initiation of some of these advocacy activities involves your company's unique expertise. I solicit your participation.

Initial efforts to implement the broad health-related authorities under Section 110 of SARA have already begun. On April 17, 1987, the Agency for Toxic Substances and Disease Registry (ATSDR) and EPA published a list of the 100 most hazardous substances found at waste sites and guidelines for development of "toxicological profiles" on those substances (52 Federal Register 12866, 12870). These profiles will be used to estimate "significant human exposure levels," to identify data needs, and to recommend further testing.

On July 16, 1987, CMA submitted written comments to ATSDR and EPA on the criteria for listing hazardous substances and on the proposed guidelines for toxicological profile development. (Copies of these comments are available from CMA upon request.) ATSDR's next step is to develop draft

BOR 007421

toxicological profiles on the first 25 substances from the list of 100 substances by October 1987. These 25 substances are identified below:

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	Tetrachlorethene
205992	Benzo(b)fluoranthene
218019	Chrysene
1745016	p-Dioxin
7439921	Lead
7440020	Nickel
7440382	Arsenic
7440417	Beryllium
7440439	Cadmium
7440473	Chromium
11196825	PCB-1260,54,48,42,32,21,1016

Although ATSDR will conduct its own scientific peer review on each of these chemical-specific toxicological profiles prior to public disclosure, CMA believes that a similar industry review of the profiles is warranted. I solicit your help in volunteering knowledgeable industry scientists, reputable consultants or other industry trade groups to participate in evaluating the first 25 draft toxicological profiles scheduled for release this October. Each industry peer review panel will consist of at least three persons with expertise on and familiarity with the health and environmental effects database for a given substance.

Although this CMA activity is focused on specific chemicals, the reviews prepared by industry panelists will be the basis for an overall CMA evaluation of the general content, format, and process by which these first 25 draft toxicological profiles were developed. Our assessment of the profiles on a chemical-specific and general basis will be important to the development of profiles on other listed chemicals during the next few years. As you know, the profiles will likely be used not only for

the purposes originally intended by SARA, but as the basis for other federal and state regulatory activities. The "significant human exposure levels" estimated in the toxicological profiles and testing recommendations on specific chemicals carry particularly onerous implications for industry.

You can help CMA ensure that the data and conclusions in the profiles are supportable by industry. Please return the attached form by Tuesday, September 1, 1987, indicating each substance of interest to your company and the industry health scientists that will help review and evaluate the toxicological profiles on those substances. Remember to note the names, address and the phone numbers of other persons outside of industry known to have expertise on any of the substances.

Note that while it is unlikely that member companies will submit confidential data to CMA in response to this request or as a result of reviewing the toxicological profiles, CMA has set up special safeguards to protect confidential information on specific chemicals from disclosure to competitors or the public. To assure this protection against disclosure, please clearly designate such documents submitted to CMA as "CONFIDENTIAL."

Further communication will be made in September 1987 to the persons you've designated as participants in this important activity. Please call Nancy G. Doerrer of my staff at 202/887-1282 if you have questions or need more information about the list of 100 substances or the development of toxicological profiles.

Sincerely yours,

Geraldine V. Cox

Geraldine V. Cox, Ph.D.
Vice President-Technical Director

Enclosure

CHEMICAL MANUFACTURERS ASSOCIATION

INDUSTRY PEER REVIEW PANELS
TO EVALUATE TOXICOLOGICAL PROFILES
ON THE FIRST 25 PRIORITY LIST SUBSTANCES
UNDER SECTION 110 of SARA

RETURN BY: Tuesday, September 1, 1987

RETURN TO:
Nancy G. Doerrer
Associate Director
Health, Safety and Chemical Regulations
Chemical Manufacturers Association
2501 M Street, NW
Washington, DC 20037
(202) 887-1282

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Substances (Circle one or more)	Health Scientist(s)	Address and Telephone Number
Benzo(a)pyrene		
Dibenzo(a),h)anthracene		
Benzo(a)anthracene		
Cyanide		
Dieldrin/aldrin		
Chloroform		
Benzene		
Vinyl chloride		
Methylene chloride		
Heptachlor/heptachlor epoxide		
Trichloroethene		

Substances	Health Scientist(s)	Address and Telephone Number
(Circle one or more)		
N-Nitrosodiphenylamine		
1,4-Dichlorobenzene		
Bis(2-ethylhexyl)phthalate		
Tetrachlorethene		
Benzo(b)fluoranthene		
Chrysene		
p-Dioxin		
Lead		
Nickel		
Arsenic		
Beryllium		
Cadmium		
Chromium		
PCB-1260,54,48,42,32,21,1016		

* * *

SUBMITTED BY:

NAME: _____

COMPANY: _____

ADDRESS: _____

_____

TELEPHONE NUMBER: _____

SIGNED _____