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9 February 1978

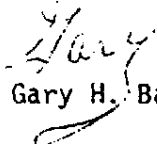
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Dear Joe:

Pursuant to our telephone conversation, enclosed is EPA's Federal Register notice regarding a public meeting to discuss a comprehensive program for the regulation of carcinogenic air pollutants. The notice is self-explanatory, but should you have any questions, please advise.

Also enclosed is a summary of a report from Denmark. The summary indicates that working in a PVC factory is not as dangerous as smoking twenty cigarettes per day. I suggest that Ted Torkelson consider looking into this study if he is not already aware of it.

Cordially,


Gary H. Baise

P.S.: There is a typographical error on page three in the first full paragraph of EPA's notice. I assume this will be corrected in the actual Federal Register notice.

Enclosures
GHB:bdb

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ENVIRONMENTAL PROTECTION AGENCY
(FRL 853-2)
REGULATION OF CARCINOGENIC AIR POLLUTANTS

Meeting

A public meeting to solicit recommendations useful in developing a comprehensive program for the regulation of carcinogenic air pollutants will be held on March 23, 1978, beginning at 8:30 EST at the Environmental Protection Agency, Waterside Mall, Room 3906, 401 M Street, S.W., Washington, D.C. This meeting will provide an opportunity for concerned parties to present their views and submit information which will be used by the Agency in evaluating possible revisions to the regulatory process for the control of airborne carcinogens.

Comments are specifically requested on a petition submitted to EPA by the Environmental Defense Fund (EDF) on November 4, 1977. This petition requests EPA to set up a comprehensive mechanism for the classification and control of airborne carcinogens. The classification system EDF proposes is somewhat similar to one proposed by the Occupational Safety and Health Administration in the October 4, 1977, Federal Register for the "Identification, Classification, and Regulation of Toxic Substances Posing a Potential Occupational Carcinogenic Risk."

EDF is requesting EPA to promulgate regulations which would establish a two step process for control of airborne carcinogens. These steps are: (1) a classification and testing scheme that would classify all carcinogenic substances under one of three categories--confirmed, probable, and possible carcinogens--with testing required of all probable and possible carcinogens to determine whether they should be placed in a higher classification, and (2) a regulatory scheme in

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which all confirmed carcinogens would be regulated automatically under Section 112 of the Clean Air Act. Probable carcinogens would be regulated under Section 111, if warranted. Time schedules are proposed for each of the actions under the two step process.

EPA will provide a copy of the EDF petition to interested parties. Copies of two reports on the Agency's cancer policy also are available.* Requests for this information should be directed to the address given in the final paragraph of this notice. The issues on which EPA requests comments and information with respect to the EDF petition or any other control program include the following:

- ° Are the criteria for classification proposed by EDF sound in light of current medical and scientific knowledge? If not, what criteria should be used?
- ° Is the classification procedure proposed by EDF, or any classification procedure, necessary, practical, and desirable?
- ° Should regulation be tied directly to classification or should other factors such as extent of exposure be considered?
- ° Should classification force further testing? By whom?
- ° In determining the appropriate degree of control, to what extent should each of the following factors be considered: the risk caused, the benefits conferred, the availability of substitutes and the costs of control? Should these factors be balanced against each other, and if so, how?

*These reports are Interim Procedures & Guidelines for Health Risk and Economic Impact Assessments of Suspected Carcinogens, Fed. Reg. 41:21402 (May 23, 1976) and Rationale Developed by the Environmental Protection Agency for the Assessment of Carcinogenic Risk, J. Nat. Cancer Inst. 53:1537-41, May 1977.

- ° Should a policy objective of zero emission for carcinogenic air pollutants be adopted? Is such a policy practical?
- ° Assuming that no safe level of exposure is known, can an acceptable level of risk be established for a pollutant or class of pollutants if the cost of eliminating exposure is too great?
- ° Assuming that no air pollution control system can completely eliminate emissions, should new sources of carcinogenic emissions be permitted to construct? If so, under what conditions?

The Agency also invites comments on any other issues relating to a classification and control program for carcinogenic air pollutants. All of those wishing to make oral presentations at the March 23, 1978, meeting should contact my March 9, 1978, the person indicated at the end of this notice. Those who wish to submit data, views, or comments in writing rather than at the meeting, are requested to send them to the same address postmarked no later than March 23, 1978. All comments received will be made available to the public. Copies of all comments received and a verbatim transcript of the meeting will be available for public inspection and copying during normal working hours at the U.S. Environmental Protection Agency's Public Information and Reference Unit, Room 2922, Waterside Mall, 401 M Street, S.W., Washington, D.C. 20460.

All communications and correspondence should be directed to U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, MD-12, Research Triangle Park, North Carolina 27711, Attn: Mr. Joseph Padgett, 919-541-5204.

Date: March 14, 1978

Jim Parker

Assistant Administrator for
Air and Waste Management

Edward F. Tuzer

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