



CHEMICAL MANUFACTURERS ASSOCIATION

February 18, 1993

To: Ethylene Dichloride Panel Members

Re: Comments on EDC ATSDR Toxicology Profile

Attached for your files is a copy of the EDC Panel's comments on the ATSDR Toxicology Profile for 1, 2 Dichloroethane. These comments were submitted to ATSDR on February 17, 1993. If you have any questions or comments, please call me at 202-887-1146.

Regards,

A handwritten signature in dark ink, appearing to read "Kathleen M. Roberts", is written over the typed name.

Kathleen M. Roberts

Manager

Ethylene Dichloride Panel

FEB 23 1993



CHEMICAL MANUFACTURERS ASSOCIATION

February 12, 1993

Gordon D. Strickland
Vice President-Technical Services

Ms. Susie Tucker
Division of Toxicology
Agency for Toxic Substances and Disease Registry
Mailstop E-29
1600 Clifton Road, NE
Atlanta, GA 30333

Re: Comments on Draft Toxicological Profile for 1,2-Dichloroethane
(CAS RN 107-06-2), Docket Control Number ATSDR-59

Dear Ms. Tucker:

The Chemical Manufacturers Association Ethylene Dichloride Panel welcomes the opportunity to comment on the October 1992 draft ATSDR Toxicological Profile for 1,2-Dichloroethane (ethylene dichloride, EDC). The Panel, chartered in 1974, represents the producers of EDC and includes the BFGoodrich Company, the Dow Chemical Company, Occidental Chemical Corporation, PPG Industries, Inc., Vista Chemical Company, and Vulcan Chemicals.

On May 15, 1989, the Panel submitted comments on the December 1988 draft of the ATSDR Toxicological Profile for ethylene dichloride. The Panel appreciates that many of those comments appear to be incorporated in this most recent draft. An issue which the Panel would like to reiterate is that the most likely route of exposure to EDC is occupational exposure to the EDC vapors. The profile should emphasize this as the potential exposure with most significance, especially in Section 1 -- Public Health Statement. Moreover, the profile should state that with the revised OSHA Permissible Exposure Limits (PEL) of 1 ppm (8-hour TWA), the workplace exposure has been significantly reduced in recent years.

The Panel notes that releases of ethylene dichloride to air and water have also decreased over the past several years, due to a number of regulatory and voluntary initiatives in which the Panel companies participate. The current TRI database would demonstrate this decrease in EDC emissions, which corresponds to a lower potential for both occupational and environmental exposures. The profile should reflect these reductions in exposure potentials in Section 5 -- Potential for Human Exposure.

In Section 2 -- Health Effects, the reference to the death of a 51 year-old man who inhaled concentrated ethylene dichloride vapors for 30 minutes is a gross overexposure situation and is certainly not reflective of normal exposure. The exposure levels were most likely extremely high and not at all representative of exposures in a workplace where EDC is handled in accordance with manufacturers'

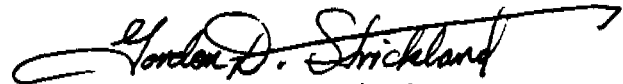
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recommendations and federal regulations, nor were they representative of potential environmental levels. Thus, the description of the human response to EDC does not adequately represent the potential response to exposures likely to be encountered.

The Panel is concerned with some issues raised in Section 2.9.2 -- Identification of Data Needs. Specifically, the Panel does not believe an additional reproductive toxicity study is needed, as sufficient data already exist (Rao, et. al. 1980). In addition, the Panel believes that conclusions from an epidemiology study, as is suggested in this section, would be questionable due to confounding effects of multiple chemical exposures and lack of any population with significant exposure.

The Panel appreciates the opportunity to submit these comments to ATSDR. If you have any questions regarding this letter or require additional information on ethylene dichloride, the Panel would be pleased to meet with you and your staff. Please contact Kathleen M. Roberts, Manager of the Ethylene Dichloride Panel, at 202-887-1146 to schedule an appropriate meeting time.

Sincerely,



Gordon D. Strickland
Vice President
Technical Services

cc: Ethylene Dichloride Panel members



CHEMICAL MANUFACTURERS ASSOCIATION
CHEMSTAR FAX

To: Ethylene Dichloride Panel Members

Jim Barter	PPG Industries	412-434-2137
Thomas Grumbles	Vista Chemical	713-588-3456
William Hayes	Dow Chemical	517-636-9899
W.C. Holbrook	BFGoodrich	216-447-6459
Phillip Ostrowski	Occidental	716-278-7297
Thomas Robinson	Vulcan Chemicals	205-877-3102

Date: December 7, 1992

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If there are any problems with this transmission, please call
202-887-1146.

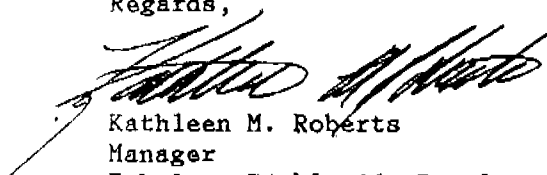
Re: ATSDR Tox Profile Comments

I have reviewed the May 1989 comments submitted by the EDC Panel on the previous ATSDR EDC toxicology profile and compared them to the latest EDC profile from ATSDR. For the most part, ATSDR appears to have addressed the comments the Panel submitted in 1989.

It may be worthwhile, however, to still communicate some concerns with ATSDR, especially the Panel's belief that inhalation is the most relevant route of EDC exposure and that ambient environmental and workplace exposure to EDC is low. The Panel may want to restate that the death of the 51 year-old man who inhaled a concentrated vapor of EDC for only 30 minutes is not reflective of normal exposure to EDC and should be clearly stated as such in the profile. The Panel could also reiterate that an additional reproduction study is not needed because data already exists and, due to confounding effects of multiple exposures, requiring an epidemiology study is questionable.

If you are interested in a copy of the May 1989 comments, please call my staff assistant, Susan Reimers at 202-887-1149. If you would like to proceed with submitting comments as proposed above, let me know. We have plenty of time, as the deadline for comments is February 19, 1993.

Regards,


Kathleen M. Roberts
Manager
Ethylene Dichloride Panel

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