

OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT



January 27, 1995

Has Shah, Ph.D.
Chemical Manufacturers Association
2501 M Street NW
Washington D.C., 20037

Dear Dr. Shah:

Thank you for your phone call yesterday, following-up on a copy of a letter from this Office dated September 19, 1994 to Francoise Drion, M.D., Association of Plastics Manufacturers in Europe, regarding the worldwide registry of cases of liver angiosarcoma from occupational exposure to vinyl chloride. As explained in the letter, the Office of Environmental Health Hazard Association (OEHHA) is completing a health risk assessment of exposure to vinyl chloride in a residential community immediately adjacent to a closed hazardous waste landfill.

Enclosed, as you requested, is a copy of the November 1990 interim health risk assessment of the landfill, and the October 1990 proposed identification of vinyl chloride as a Toxic Air Contaminant in California. In December 1990, the Air Resources Board adopted the unit risk value for vinyl chloride recommended in the October report (20×10^{-5} [ppb]⁻¹).

In July 1991, Governor Wilson created the California Environmental Protection Agency (Cal/EPA). The Hazardous Waste Toxicology Section, which prepared the interim health risk assessment, and the Air Toxicology and Epidemiology Section, which prepared the Toxic Air Contaminant report, were transferred from the Department of Health Services to OEHHA in Cal/EPA.

You mentioned the Chemical Manufacturers Association nine-member panel of manufacturers of vinyl chloride in the United States. I would like to take this opportunity to ask if any of the manufacturers could provide clarification regarding the New York resident diagnosed with liver angiosarcoma reported by Brady *et al.*, in "Angiosarcoma of the Liver: An Epidemiologic Survey", *Journal of the National Cancer Institute*, 1977, 59(5): 1383-11385. The authors state "Of possible importance is the fact that the ambient emissions of VC monomer for the factory located approximately 1,700 feet from the residence of patient #10 were as high as 92,800 parts per million in 1975."

I am looking forward to receiving the articles and information you are sending, and to further discussions with you.

Sincerely,

Lillian J. Kelly, M.P.H.
Associate Hazardous Materials Specialist
Hazardous Waste Toxicology Section

Enclosure

CMA 114083



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Goodyear plant in Niagara Falls

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Sincerely,

Lillian J. Kelly, M.P.H.
Associate Hazardous Materials Specialist
Hazardous Waste Toxicology Section

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1975-

Exposure to vinyl chloride
Community Workshop
Good year
Niagara Falls, N.Y.

Prop. 65

Dept. of Health Study

Reproductive outcome

Martin

KHARA 221

552 4011 26531

5105240365-7

Jim Donald

916 445 5652

kit 2 used

Old Maltoni '79

New data at WH not used

Air Resources Board

2-5 + 10 -5

4-5 + 10 -5 ppb

20 + 10 current unit

The Goodyear Tire & Rubber Company

Akron, Ohio 44316-0001

June 23, 1995

Ms. Lillian J Kelly
Hazardous Waste Toxicology Section MS-241
California Environmental Protection Agency
601 North 7th Street
Sacramento, CA 94234-7320

Dear Ms Kelly:

Re: January 27, 1995, Lillian J Kelly, M.P.H. Letter to Has Shah, Ph. D.

This letter is in response to Dr Shah's request that The Goodyear Tire & Rubber Company clarify an issue raised in the above referenced letter. (See attached).

In your letter, you had inquired about clarification of information in a 1977 article published in the Journal of the National Cancer Institute, "Angiosarcoma of the Liver". This information referenced ambient emissions of vinyl chloride monomer for a factory located approximately 1,700 feet from a residence being as high as 92.800 parts per million in 1975.

As a matter of information it would be essentially impossible for such an ambient concentration approaching 10% by volume of vinyl chloride to ever occur in the air. Nevertheless, Goodyear's records were searched and, as expected, there were no ambient monitoring results found at the referenced high level.

To the contrary, fence-line monitoring data obtained for Goodyear's Niagara Falls, New York plant in 1975 indicated that vinyl chloride was typically non-detectable.

Additionally, during the 1970's, Goodyear was not the only company operating a PVC manufacturing plant in the Niagara Falls, New York area.

Goodyear believes that the referenced ambient air value must be in error and strongly urges that the State of California not utilize this data in their health risk assessment of exposure to vinyl chloride. It is not scientifically sound to use information that is not substantiated and apparently not correct.

CMA 114086