

Air Products

6-517

SAFETY
↓

RECEIVED

Date October 19, 1978

INTEROFFICE
MEMORANDUM

OCT 20 1978 Subject TOXIC SUBSTANCES MANAGEMENT MEMO

RAW PAPER

To Distribution

(Location, Organization, or Department)

From C. E. Blades

Piscataway

(Location, Organization, or Department)

Enclosed for your information is the October 6, 1978 issue of
TOXIC SUBSTANCES MANAGEMENT MEMO.

Distribution

W. M. Smith
L. B. Tepper
A. J. Diglio
J. C. Novak
R. H. Schenck
W. Ent
G. Handley
G. Frieling
R. Fleming
E. Handwerk
R. Woodbury
J. H. Body
W. Custead
J. R. Lovett
J. Dempsey

H. Deitzer
H. Gallagher
J. Pauloski
D. Hartter
T. V. Pillitteri
R. M. Winters
H. Harwell
K. Oster
R. C. Kern
T. Coneybeer
J. Urenovitch - Hometown
L. Iceman
C. McKinley
J. Egan

CEB:sk
Encl.

C. E. Blades
C. E. Blades

List Revised 10/10/78

(320)

AP00049846

Consult

MANUFACTURING CHEMISTS ASSOCIATION

1825 CONNECTICUT AVENUE, N.W., WASHINGTON, D.C. 20009

OCT 10 78 - CEB

TELEPHONE: (202) 328-4200
TELEX: 89617 (MCA WSH)

Toxic Substances Management Memo

Oct. 6, 1978

MCA TO STUDY TSCA'S ECONOMIC IMPACT ON THE CHEMICAL INDUSTRY

MCA is planning to conduct a one-year pilot study on the economic impact of the Toxic Substances Control Act on the chemical industry. The investigation will be conducted by National Economic Research Associated. If the pilot study is successful, the data-collection program may be continued for two or three more years.

The information will be used to address specific issues raised during the preparation of regulations to implement the act. Such data also will help support MCA positions to be presented at the first major Congressional oversight hearing on TSCA, expected in two or three years.

(continued on page 2)

KNOW SOMEONE WHO NEEDS TSMM? TELL US.

In the past, the circulation of this bulletin was limited to one key contact in each member company and to selected trade associations. A growing number of chemical industry personnel are expressing interest in the information contained in these memos and are being added to the mailing list. If you know of others in your company who should receive TSMM because of their heavy involvement with emerging TSCA regulations, send their names and addresses to James P. Turner at MCA.

For additional information about subjects mentioned in this memo, contact Jim Turner at MCA. His number is (202) 328-4286.

AP00049847

Toxic Substances Management Memo Page 2

(continued from page 1)

The pilot study will:

- Define the methodology and collect actual costs for complying with the act, and

- Identify economic indicators and define a methodology for measuring the impact of TSCA on the chemical industry and the U. S. economy.

Initially, a small number of companies will work with MCA and NERA to define cost/benefit factors and data collection methods which will be consistent, auditable and credible. In the next step, a large number of MCA member companies will be asked to collect actual cost data on TSCA's impact on the chemical industry.

CHEMICAL USE LIST APPEARS USELESS, MCA TELLS EPA

It's hard to make constructive suggestions concerning a chemical use list being prepared by the Environmental Protection Agency, MCA says, because it isn't apparent what purposes the list will serve.

Responding to an invitation in the July 25 Federal Register to comment on the developing list, MCA says it can't see how the device in present form can help industry in reporting or EPA in analyzing such reports.

The collection of use information for selected chemicals or categories of chemicals may be appropriate as a partial indicator of exposure, and chemical use reporting as a combination of function and application may be a workable concept, the Association holds. However, MCA agrees with EPA "that a list identifying all significant uses may never be feasible."

In asking EPA to take the list back to the drawing board, the Association points out a number of basic problems, such as: uses were omitted from List I, definitions are not clearly understandable, cited uses are ambiguous so a given use could be classed under a number of function/application combinations, conflicts with commercially established trade terms occur and problems appear in every area of chemical technology, requiring that persons using the list have extensive industrial experience.

AP00049848

Toxic Substances Management Memo Page 3

Criteria for determining which "new uses" are "significant new uses," not yet developed by EPA, involve considerations of human and environmental exposure beyond the scope of the chemical use list, MCA notes, and should be stated explicitly and separately by EPA.

SECTION 5 RULES NEARING PUBLICATION

John DeKany, deputy assistant administrator in EPA's Office of Toxic Substances, says the Agency expects to publish section 5 rules by late October or early November. Speaking at a recent MCA meeting, he indicated that EPA had abandoned the "five category" (of intended uses) scheme for scaling test requirements in favor of a more flexible concept closer to MCA's position.

AP00049849