

TELECOPY COVER SHEET

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From: B. Romano

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It is hoped that the above has clarified any concerns you may have had on the OAOPS support for the additional testing of 1,1-Dichloroethylene under section 4(a)(1)(A) of the Toxic Substances Control Act.

Sincerely yours,

Nancy B. Pate

Nancy B. Pate, D.V.M.
Project Officer
Pollutant Assessment Branch

cc: C. Glasgow
R. Schell
G. Timm
R. Northrop

SL 063044



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

15 JUN 1987

RECEIVED JUN 19

Dr. Robert R. Romano
Associate Director, Special Programs
Chemical Manufacturers Association
2501 M Street, NW
Washington, DC 20037

Dear Dr. Romano:

Your letter of March 20, 1987 concerning the OAQPS support of the Proposed Test Rule for 1,1-Dichloroethylene reveals a need for some clarification in several areas.

First, additional testing will clearly improve the data base for risk assessment. The weight of evidence supporting the current risk estimate is inadequate to support regulation under the Clean Air Act at this time. The proposed testing, conducted using appropriate protocol, will strengthen the case one way or the other.

Second, we are not supporting a test rule for 1,1-Dichloroethylene principally because of the State initiative program. Rather, we are saying that in the event that the results of the proposed testing strengthens the case for not developing Federal regulations, it will assist State and local agencies in helping to identify any potential high risk sources of 1,1 Dichloroethylene for further evaluation. As you may be aware, the identification and evaluation of high risk point sources is one of the elements of the multi-year development plans that the states are required to submit as a part of the Agency's Air Toxic's Strategy.

In short, the proposed testing helps fill an existing data gap with respect to the quality of the evidence implicating 1,1-Dichloroethylene as a carcinogen as well as assisting in defining the potency if it is a carcinogen. In referencing the Federal toxic air pollutant assessment program and the State initiative program, we are only establishing that there exists regulatory programs that will benefit from answers to such questions.

The emission and exposure information that you provided is appreciated. However, as you are aware, the Human Exposure Model requires significantly more data, including the location of each emissions source, before it can be executed.

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