



00274D 49182

June 21, 2001

The Dow Chemical Company
Midland, Michigan 48674

E, -019

2PP

Document Control Office (7407)
Office of Pollution Prevention and Toxics
Environmental Protection Agency, N.W.
1200 Pennsylvania Avenue, N. W.
Washington, D.C. 20460

RE: OPPTS-00274D - Vinylidene Chloride (CAS No. 75-35-4) Commitment

Dear Sirs:

Vinylidene chloride (CAS Number 75-35-4) has been identified as one of the twenty-three compounds the Environmental Protection Agency wishes to see sponsored under the Voluntary- Children's Chemical Evaluation Program (VCCEP) which was announced in the Federal Register on December 26, 2000.

The Dow Chemical Company ("Dow") actively supports scientific research designed to develop information about the safety of Dow's products for people of all ages, including children. Vinylidene chloride (VDC) has undergone an extensive battery of tests over the years, many of which correspond to the data requested in the VCCEP. All of Tier I data and most of Tier II data has been developed. VDC is also currently going through EPA's IRIS review and update and is the subject of the pending HAPs test rule. The ongoing IRIS review is especially germane to the overall decision of participating in the VCCEP. Bearing that in mind, The Dow Chemical Company has agreed to undergo a peer consultation as described in the VCCEP Federal Register Notice for VDC. For the peer consultation, all available hazard data will be made available. This includes all of Tier I, most of Tier II, and a portion of Tier III data. In addition, Dow will develop an exposure assessment that meets or exceeds the requirements of the Tier I exposure assessment specified by EPA. Dow will then develop a risk assessment that integrates the hazard and exposure assessments and characterizes the potential risks to children posed by VDC.

Dow will submit the peer consultation document to EPA approximately 3 months after the final IRIS report is released. This will enable incorporation of the findings and conclusions of the IRIS review into the VCCEP peer consultation process. However, in order to ensure adequate time to assess available exposure data and complete the risk characterization, Dow will be unable to participate in the peer consultation process prior to April, 2002.

RECEIVED
OPPTS-TOXICS

2001 JUN 26 AM 9:37

Contain NO CBI

OPPTS-00274D – Vinylidene Chloride (CAS No. 75-35-4) Commitment

June 21, 2001

Page 2

In order to answer any questions you may have as well as clarify this approach to participating in the VCCEP, representatives of The Dow Chemical Company would like to meet with representatives of the EPA over the course of the next couple of months. The Dow VDC technical contact for EPA is Connie Deford. Her contact numbers and email address are as follows:

Phone: (989) 636-6978

Fax: (989) 638-9615

cldeford@dow.com

We look forward to working in concert with the EPA to address public concern about chemicals in the environment and the potential implications for children's health.

Sincerely,

Gregory G. Bond, Ph.D., M.P.H., F.A.C.E.
Corporate Director of Product Responsibility
The Dow Chemical Company
Midland, MI 48674
Phone: 989-636-9063
Fax: 989-636-0389