

74I-0794-000985 # 1010846

REILLY TAR & CHEMICAL CORPORATION

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(A)

September 20, 1984

Mr. Martin Greif, Executive Secretary
TSCA Interagency Testing Committee
Environmental Protection Agency (TS-792)
401 M Street, S.W.
Washington, D.C. 20460

Contains No

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OPPT DIV
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- Re: 2-Methylpyridine (109-06-8)
- 3-Methylpyridine (108-99-6)
- 4-Methylpyridine (108-89-4)
- Methylpyridine (1333-41-1)



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Dear Mr. Greif:

I am writing to send some information concerning the listed compounds, as requested by Mr. Lou Borghi of Dynamac Corporation.

I have previously sent to you volume and exposure information for 4-methylpyridine and for 2-pyridineethanol (103-74-2), an intermediate for the manufacture of 2-vinylpyridine, a major product prepared from 2-methylpyridine.

I have also sent to the EPA some unpublished health and safety studies on the methylpyridine isomers, as required in 40 CFR 716 and 49 FR 30188.

By way of background, Reilly is a major manufacturer of 3-methylpyridine (and pyridine), and may be the only significant manufacturer of 2- and 4-methylpyridine in the United States; some 2-methylpyridine is imported. One of Reilly's products is "mixed picolines" which is a mixture of variable amounts of 3- and 4-methylpyridine. This mixture is a very low-volume product.

Volumes and Uses

The latest Chemical Economics Handbook (SRI 1983) product review on pyridine and pyridine bases is believed to give a sufficiently accurate picture of production volumes and uses of 2- and 3-methyl-

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pyridine. The major outlets for the use of these compounds are as intermediates for the manufacture of 2-vinylpyridine, food and feed additives, pharmaceuticals, and agricultural chemicals. In most of the major uses, the methylpyridine isomers are entirely consumed by chemical transformations.

Occupational Exposure

Fewer than 300 operating and maintenance personnel work in Reilly's operating units where methylpyridines are manufactured or used. All of the manufacture and most of the use take place in continuous enclosed processing units. Potential chemical exposure in these facilities is generally limited to maintenance and sampling, and protective equipment (minimum gloves and goggles) is required in those operations. A cursory review of employee monitoring data collected since 1978 reveals typical exposures of less than 0.2 ppm (8-hr. TWA) for 2-methylpyridine or 3- and/or 4-methylpyridine. (The latter two isomers are not differentiated in this analysis.)

We cannot comment in a meaningful way on potential occupational exposure in the operations of our customers or our competitors; however, it is worthy of note that only a relatively small number of chemical manufacturing companies, all experienced in safe large-volume chemical manipulations, are involved in the manufacture or use of the methylpyridines.

Environmental Exposure

In Reilly's operations, traces of methylpyridines are lost in process waste water, which is sent to a POTW by city sewer. Information on the composition of Reilly's waste streams has been previously submitted to the EPA as confidential business information. Information demonstrating the biodegradability of methylpyridines, using POTW bacteria, was submitted previously to EPA.

No methylpyridines are routinely discharged to air or land.

Structure-Activity Relations

No alkylpyridine has been shown to cause cancer, gene mutations, or birth defects.

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Mr. Martin Greif

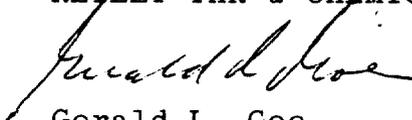
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I hope you find this information useful. If I can be of further help, please write or call.

Yours very truly,

REILLY TAR & CHEMICAL CORPORATION



Gerald L. Goe
Director of Research

GLG/jr

cc: Mr. Lou Borghi
Dynamac Corporation
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