

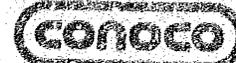
CODING FORMS FOR SRC INDEXING

Microfiche No.	OTS0001053		
New Doc ID	FYI-OTS-0794-1053	Old Doc ID	84940000150
Date Produced	07/20/84	Date Received	07/26/94
		TSCA Section	FYI
Submitting Organization	CONOCO INC		
Contractor			
Document Title	INITIAL SUBMISSION: LETTER FROM CONOCO INC TO USEPA REGARDING TSCA ITC EARLY REVIEW OF 2-CHLORO-1,3-BUTADIENE (CHLOROPRENE), DATED 7/20/84		
Chemical Category	2-CHLORO-1,3-BUTADIENE (CHLOROPRENE)		

IR405



741-94-001053
INIT 87/26/94



#082084(1)



84940000150

Conoco Chemicals Company
A Division of Conoco Inc.
18500 North Barkers Landing Road
P.O. Box 19029
Houston, TX 77224

→ Will Perry
8/3/84

July 20, 1984

741-0794-001053

Mr. Martin Grief
Executive Secretary
TSCA Interagency Testing Committee
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

RECEIVED
94 JUL 26 PM 3:36

RE: REVIEW ACTIVITY REGARDING 2-CHLORO-1,3-BUTADIENE (CHLOROPRENE)
YOUR LETTER OF MAY 15, 1984, TO CONOCO VCM PLANT

Dear Mr. Grief:

Conoco Chemicals appreciates the opportunity to comment on the review activity concerning chloroprene. Conoco Chemicals supports the statutory purpose of TSCA and commends the ITC for soliciting public comment and data submission at an early stage in the chemical selection and recommendation process. The following comments regarding our production of chloroprene are offered to assist the ITC in prioritizing chemicals to be recommended for testing.

Chloroprene occurs as a reaction by-product in the manufacture of ethylene dichloride at the Conoco Chemicals' VCM plant. The chloroprene remains in this stream for further processing, which includes chlorination. Analysis shows that 99.5% of the chloroprene is destroyed during this chlorination step. The balance (approximately 8,660 lbs./yr) is a constituent (less than 1%) of the light-ends by-product stream. This stream is sold to another company where the chloroprene is chemically destroyed by further chlorination.

These processes are totally enclosed. Consequently, the potential for occupational or environmental exposure is negligible.

On the 1978 TSCA Inventory list, Conoco Chemicals reported production of 1.71 MM lbs. of chloroprene. Current annual production is still at approximately this level. Chloroprene is not a commercial product for Conoco Chemicals, nor is it separated or concentrated in any form. Therefore, no technical bulletins or material safety data sheets are available.

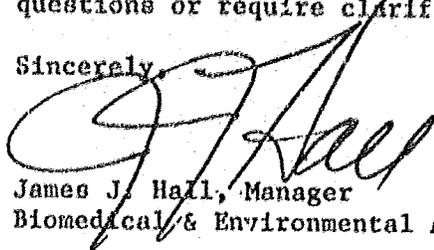
In summary, although the 1978 TSCA Inventory indicates the production of a significant amount of chloroprene by Conoco Chemicals, this chemical

Mr. Martin Grief
Page 2
July 20, 1984

remains in an entirely enclosed system during its existence, virtually eliminating the possibility of environmental release.

We will be happy to provide additional assistance should you have any questions or require clarification of the information above.

Sincerely,



James J. Hall, Manager
Biomedical & Environmental Affairs

ajo