

CODING FORMS FOR SRC INDEXING

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		TSCA Section	8E
Submitting Organization		DOW CHEMICAL CO	
Contractor			
Document Title		SUPPORT: LETTER FROM DOW CHEMICAL CO RESPONDING TO USEPA REQUEST OF 091499 FOR FURTHER INFORMATION RE EMPLOYEE FATALITY FOLLOWING EXPOSURE TO 2,4-DICHLOROPHENOL, DATED 112499	
Chemical Category		2,4-DICHLOROPHENOL	

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The Dow Chemical Company
Midland, Michigan 48674

2030 DOW CENTER
November 24, 1999

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CONTAINS NO
CONFIDENTIAL BUSINESS INFORMATION



8EHQ-98-14302

Document Control Office (7407)
Room G99 East Tower Attn: Section 8(e)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460-0001

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pdcN 88990000021

Re: 8EHQ-1098-14302
Response to Second Request for Additional Information

Dear Sir/Madam:

Reference is made to your request dated September 14, 1999.

Dow has reviewed the draft document provided by EPA entitled
"CHEMICAL ADVISORY AND NOTICE OF POTENTIAL RISK: Skin
exposure to 2,4-Dichlorophenol (DCP) can cause rapid death."
We offer the following comments:

1. On Page 2, Case #1 - The operator was not repairing a pump seal. Rather, the investigation revealed the leak was in piping ansillary to the pump. Also, the reference to the submission by Dow under TSCA section 8(e) seems unnecessary. Dow may become the focus of future inquiries for information based upon this reference. Thus, we suggest this and all other direct references to Dow be removed from the document so that inquiries will more likely be addressed to EPA and not Dow.
2. On Page 3, Case #3 - Again, the reference to Dow should be removed for the reasons stated above. Further, we suggest striking the phrase "According to company reports." And by way of additional information, medical personnel now have concluded that the pathology report regarding the 1980 fatality

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likely did not reflect the true cause of death inasmuch as the level of detection of DCP in serum and urine were such that an inaccurate conclusion was made at the time.

3. On Page 4, Item 1b) - We suggest that heating solid DCP does not result in a solution or slurry, but rather simply the liquid state of DCP.
4. On Page 4, Item 2b) - References to Dow should be removed for the reasons stated above. By way of additional information, EPA may refer to "Corrosion Data Survey," 6th edition, published by NACE International of Houston for more information on the selection of materials for construction of equipment for use with DCP. Dow is primarily using stainless steel.
5. Page 5, Item 2c) - Reference to Dow AgroSciences should be removed for the same reasons given above regarding references to Dow. By way of additional information, the Industrial Hygiene Guideline of 1 ppm was determined based upon inhalation route, not skin absorption. The skin notation in the IHG refers to the possibility of causing a rash, and is not related to skin absorption leading to possible death.
6. Page 5, Item 3b) - The quotation and reference to the Dow Material Safety Data Sheet should be removed for the reasons given above. If EPA wishes to use the information in the MSDS to craft its own statement, that would be preferable.
7. Page 7, REFERENCES - The reference of the Dow AgroSciences MSDS need not be included.
8. Page 8, APPENDIX A - The reference to "1261 Building" at Dow should be removed as that building is not the facility using DCP. The 1261 Building is the Environmental Services administration building in Midland, Michigan.

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As for your other requests:

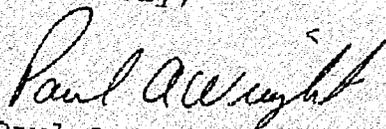
1. Dow medical personnel have confirmed the following information regarding levels of DCP in the urine and serum of the victim.

Sample	Free DCP (ug/ml)	Total DCP (ug/ml)
Urine	4.8	6.2
Blood	7.2	13.1

2. Dow has no current plans to conduct additional air monitoring relative to DCP. Dow previously provided all the known air monitoring data available.

Dow has no further information to convey on the requests. If you have any questions on this matter, please continue to direct them to the undersigned.

Sincerely,



Paul A. Wright
Counsel
Legal Department
517/636-1853

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