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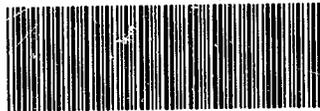
915 DOCUMENT RECEIPT DEC

MCDONNELL DOUGLAS

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May 24, 1991



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Environmental Protection Agency  
Document Processing Center (TS-790)  
Office of Toxic Substances  
401 "M" Street  
Washington, D.C. 20460

8EHO-0591-1254 Init.

ATTN: 8(e) Coordinator

RE: Preliminary Screening Results of Health Risk Assessments Conducted Pursuant to the California Air Toxics Hot Spots Information and Assessment Act (California Health & Safety Code, Sec. 44340-44384)

Dear Sir or Madam:

In accordance with the requirements of the California Air Toxics Hot Spots Information and Assessment Act of 1987 (Assembly Bill 2588) codified in California Health and Safety Code Sections 44340-44384, four McDonnell Douglas Corporation (MDC) California facilities are preparing health risk assessments (HRAs) for submittal to the South Coast Air Quality Management District.

AB-2588 passed by the California Legislature in 1987 requires operators of facilities emitting more than a specified level of AB-2588 listed air pollutants to perform a biennial inventory of their toxic emissions. This inventory report involves the collection of site specific information in order to determine the nature and quantities of emissions from a facility, and establish a basis for a determination of the health risks associated with these emissions. The requirements of AB-2588 consist of four major parts; (1) Emission Inventory Plan Preparation, (2) Emission Inventory Report Preparation, (3) Risk Assessment, and (4) Public Notification.

The results of the initial screening analyses used to focus the direction of the detailed health risk assessment studies have recently been reported to MDC by its HRA consultants. While MDC has not determined that these preliminary results reasonably support a conclusion of substantial risk of injury to health or the environment, MDC is nevertheless submitting this information under TSCA 8(e) in order to adequately inform the Administrator.

The initial screening results which have been verbally reported to McDonnell Douglas Corporation by its HRA consultants, are as follows:

- Douglas Aircraft Company facility in Long Beach, California: Cancer risk to the hypothetical maximum exposed individual of  $16 \times 10^{-4}$  with a  $1 \times 10^{-6}$  cancer risk isopleth extending up to 20 kilometers from the facility. Hexavalent chromium, cadmium and methylene chloride are the major contributors to the risk numbers.
- Douglas Aircraft Company facility in Torrance, California: Cancer risk to the hypothetical maximum exposed individual of  $1 \times 10^{-4}$  with a  $1 \times 10^{-6}$  cancer risk isopleth extending up to 10 kilometers from the facility. Hexavalent chromium, cadmium and methylene chloride are the major contributors to the risk numbers.

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- McDonnell Douglas Helicopter Company facility in Culver City, California: Cancer risk at fence line of property of "probably no less than  $1 \times 10^{-5}$  but could be  $9 \times 10^{-4}$ . Hexavalent chrome is the major contributor to the risk numbers.

The final screening results verbally received are as follows:

- McDonnell Douglas Space Systems Company facility in Huntington Beach, California: Cancer risk to the hypothetical maximum exposed individual of  $2.4 \times 10^{-4}$  with a  $1 \times 10^{-6}$  cancer risk isopleth extending up to 2.5 kilometers from the facility. Hexavalent chrome is the major contributor to the risk numbers.

Unit risk factors (URF) used in the risk calculations are those generated by the California Department of Health Services. The California mandated unit risk factors are in some instances more conservative than those specified by the EPA. For hexavalent chrome, the California unit risk factor (0.146 meters cubed per microgram) is approximately 12 times more conservative than EPA's unit risk factor (0.012 meters cubed per microgram).

In accordance with regulatory requirements, the results of the detailed health risk assessments will be provided to the District on or before June 7, 1991. The District shall make the HRAs available for public review, upon request. After preliminary review of the emissions impact and modeling data the District will submit the HRAs to the California Department of Health Services for review and comments on the data and findings relating to health effects. If in the judgment of the District there is a significant health risk associated with emissions from the facility, notification to the public will be provided as directed by the District.

Sincerely,



**J. H. Copeland**  
Principal Staff Consultant  
Occupational, Safety, Health &  
Environmental Affairs  
McDonnell Douglas Corporation  
Post Office Box 516  
Mailcode 1003242  
St. Louis, MO 63166  
(314) 233-9469



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUL 17 1991

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

**CERTIFIED MAIL**

Mr. J. H. Copeland  
Occupational, Safety, Health & Environmental Affairs  
McDonnell Douglas Corporation  
P.O. Box 516, Mailcode 1003242  
St. Louis, Missouri 63166

Dear Sir:

With regard to:

TSCA Section 8(e) submission on: Cr<sup>6</sup>, Cd, methylene chloride

Submitted by: McDonnell Douglas Corporation

Date submitted: May 24, 1991

EPA Document Control Number: 8EHQ-0591-1254

EPA's Office of Toxic Substances (OTS) has completed a preliminary review of the above referenced information submitted to the Agency under Section 8(e), the "substantial risk" information reporting provision of the Toxic Substances Control Act (TSCA). Enclosed is a copy of a submission "Summary" for your records.

Please refer to the enclosure entitled "EPA Information Requests" for specific questions concerning the above referenced Section 8(e) submission.

Should you have any technical questions about this letter, please call Ms. Jacqueline T. Favilla of the Chemical Screening Branch/ECAD at (202) 475-8823. Any questions that you may have regarding TSCA Section 8(e) policy should be directed to Mr. David R. Williams at (202) 382-3468.

The Agency looks forward to continued cooperation with your company in its ongoing efforts to evaluate and minimize the potential risks posed by chemical substances to health or the environment.

Sincerely,

James F. Darr, Section Head  
Chemical Risk Identification  
Section/CSB/ECAD/OTS TS-778

Enclosures

**EPA INFORMATION REQUESTS**

- 1 -

With regard to 8EHG-0591-1254, EPA:

1.  is not asking for any additional technical information at this time, but may do so in the future.
2.  requests that you ensure that EPA receives a full copy of the final report (including the actual experimental protocol, results of gross/histopathologic examinations (where applicable), data, results of any statistical analyses, etc.) from each study, the summarized or preliminary results of which were presented in the submission.
3.  requests that you describe the actions that your company has taken or plans to take on a voluntary basis to:
  - a.  notify  workers,  others and/or  \_\_\_\_\_ about the reported findings,
  - b.  reduce and/or eliminate exposure to the subject chemical(s).
4.  requests that you provide complete copies of Material Safety Data Sheets and labels that have been revised to reflect the reported findings.
5.  requests that you describe (by way of short summaries) the nature and results, if available, of all studies (other than those submitted already to EPA or those cited in the published scientific literature) about which your company is aware or that your company has conducted, is conducting or plans to conduct that are designed to determine the toxicity of or the exposure to the subject chemical(s).
6.  requests that you provide substantiation for any TSCA Confidential Business Information (TSCA CBI) claim(s) asserted for this TSCA Section 8(e) notice by responding in full to the questions posed in the attachment entitled "Support Information for Confidentiality Claims."
7.  Other:

All information requested herein should be transmitted to the OTS Document Processing Center at the address provided on the next page within 20 working days of your receipt of this EPA mailing; with the exception of responses to TSCA CBI substantiation requests,

which are discussed further below, any requested information or supplemental information that is not yet available but becomes available following your response to this mailing should be sent to EPA immediately upon your company's receipt of such information.

OTS Document Processing Center (TS-790)  
(Attn: Section 8(e) Coordinator)  
Office of Toxic Substances  
U.S. Environmental Protection Agency  
401 "M" Street, S.W.  
Washington, D.C. 20460

In responding to any EPA requests for information, or in otherwise communicating with the Agency about this Section 8(e) file, please refer to the EPA Document Control Number that has been assigned to this file.

As is the case for initial TSCA Section 8(e) submissions, all responses/correspondence will be placed in the OTS public files unless confidentiality is claimed in accordance with the procedures outlined in 1) Part X of EPA's March 16, 1978 Section 8(e) policy statement ("Statement of Interpretation and Enforcement Policy; Notification of Substantial Risk" 43 FR 11110), and 2) 40 CFR Chapter 1, Section 2.203 et seq., and 41 FR 36902, September 1, 1976 as amended at 43 FR 40000, September 8, 1978 and 50 FR 51661, December 18, 1985. In the event that a claim for confidentiality is made on all or part of the provided information, said information will only be released by EPA to the extent, and by means of the procedures, set forth in the cited regulations.

If you have been asked to provide full substantiation for TSCA CBI claims under EPA Information Request No. 6 on the preceding page, you are advised that pursuant to 40 CFR, Chapter 1, Section 2.204 et seq., EPA is determining whether the information in your TSCA Section 8(e) filing is entitled to confidential treatment. You must file within 20 working days a full written response to each question posed in the attached item entitled "Support Information for Confidentiality Claims." Requested information provided by you which is claimed confidential shall not be disclosed by EPA except in the manner provided by 40 CFR Chapter 1, Section 2.205(c).

If you need an extension of time in which to answer the questions posed in the attachment, please direct a written request to the above address prior to the date on which answers are due to EPA.

If you do not respond to these substantiation questions or do not request an extension within the time period provided, the Agency will construe your failure to respond or to request an extension as a waiver of your confidentiality claim(s).

Attachment

8(e) Submission Summary

SUBMISSION NUMBER: 8EHQ-0591-1254 INIT SEQ:A  
 SUBMISSION DATED: May 24, 1991  
 SUBMITTER NAME: McDonnell Douglas Corporation

CHEMICAL NAME (CAS #): Chromium hexavalent ion (18540-29-9),  
 cadmium (7440-43-9), methylene chloride  
 (75-09-2)

Cr <sup>6+</sup>	Cd	CH <sub>2</sub> Cl <sub>2</sub>
Chromium hexavalent ion	Cadmium	methylene chloride

STUDY DESIGN AND RESULTSPreliminary Screening Results of Health Risk Assessments (Summary Results)

Dosage/route/duration: A biennial inventory of toxic emissions was prepared which involves the collection of site specific information in order to determine the nature and quantities of emissions from a facility, and establish a basis for a determination of the health risks associated with these emissions. The results of the initial screening analyses used to focus the direction of the detailed health risk assessment studies have recently been reported.

RESULTS:

- Douglas Aircraft Company facility in Long Beach, California: Cancer risk to the hypothetical maximum exposed individual of  $16 \times 10^{-4}$  with a  $1 \times 10^{-6}$  cancer risk isopleth extending up to 20 kilometers from the facility. Hexavalent chromium, cadmium and methylene chloride are the major contributors to the risk numbers.
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- McDonnell Douglas Helicopter Company facility in Culver City, California: Cancer risk at fence line of property of "probably no less than  $1 \times 10^{-5}$  but could be  $9 \times 10^{-4}$ ". Hexavalent chrome is the major contributor to the risk numbers.
- McDonnell Douglas Space Systems Company facility in Huntington Beach, California: Cancer risk to the hypothetical maximum exposed individual of  $2.4 \times 10^{-4}$  with a  $1 \times 10^{-6}$  cancer risk isopleth extending up to 2.5 kilometers from the facility. Hexavalent chrome is the major contributor to the risk numbers.

8(e) Submission Summary (Continued)SUBMISSION NUMBER: 8EKO-0591-1254 INIT SEQ:AOTHER:

The submitter reported that the screening results were performed in accordance with the requirements of the California Air Toxics Hot Spots Information and Assessment Act of 1987 (Assembly Bill 2588) codified in California Health and Safety Code Sections 44340-44384 for submittal to the South Coast Air Quality Management District. The AB-2588 requires operators of facilities emitting more than a specified level of AB-2588 listed air pollutants to perform a biennial inventory of their toxic emissions.

The submitter also reported that "Unit risk factors (URF) used in the risk calculations were those generated by the California Department of Health Services. The California mandated unit risk factors are in some instances more conservative than those specified by the EPA. For hexavalent chrome, the California unit risk factor (0.146 m<sup>3</sup>/μg) is approximately 12 times more conservative than EPA's unit risk factor (0.012 m<sup>3</sup>/μg).

VOLUNTARY ACTIONS INDICATED:

WORKER/OTHERS NOTIFICATION

EXPOSURE REDUCTION

MSDS/LABELS CHANGED (results in current MSDS)

OTHER The submitter stated that "In accordance with regulatory requirements, the results of the detailed health risk assessments (HRAs) will be provided to the District on or before June 7, 1991. The District shall make the HRAs available for public review, upon request. After preliminary review of the emissions impact and modeling data the District will submit the HRAs to the California Department of Health Services for review and comments on the data and findings relating to health effects. If in the judgement of the District there is a significant health risk associated with emissions from the facility, notification to the public will be provided as directed by the District."