88-7800146

8EHQ-0578-0146

(A)

hooker

222 RAINBOW BOULEVARD NORTH, BOX 728, NIAGARA FALLS, NEW YORK 14302
PHONE (716) 278-7000

May 12, 1978

RECEIVED
19 MAY 1978
JMJ

Director of the Office of Toxic Substances
(WH 557)
United States Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Subject: Pre-1977 Information Reportable Under Section 8(e) of TSCA

Dear Sir:

The following pre-1977 information is being submitted to the EPA under Section 8(e) of TSCA on behalf of Hooker Chemicals & Plastics Corp. (HCPC) specifically its facility at Taft, Louisiana, P.O. Box 74, Hahnville, Louisiana 77057. The report is being made by D. A. Guthrie, Acting Vice President - Environment, Employee Health & Safety, 222 Rainbow Blvd., Niagara Falls, New York 14302. Telephone (716)278-7447. This report covers health effects, specifically alleged injuries from primarily chlorine gas exposure.

During the 1973 to mid-1975 period, HCPC was engaged in a major construction project at its Taft, Louisiana chemical plant. This plant is in the immediate vicinity of a number of other chemical plants, including Union Carbide Corporation (acrolein and other hydrocarbons) and Beker Industries (diammonium phosphate plant).

The construction project was concentrated in a section of the plant approximately 200 feet distant from the closest point to the operating areas. The construction workers were exposed to airborne chemicals from the several plants and, on at least one occasion, to a chlorine gas emission from the HCPC plant. Other chemicals handled at the HCPC plant, which might have been emitted into the air, are TCE, PCE, HCl, sulfur monochloride, but there were no documented significant emissions of these other chemicals during the time in question.

In 1974 more than 160 workers brought lawsuits against HCPC in federal and state courts for injuries allegedly suffered as a result of exposure to chlorine and other gases emitted from the plants of HCPC and UCC. In many instances the complained-of injuries were taken verbatim from earlier complaints as were the descriptions of the causes. These alleged injuries included loss

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of taste and smell, muscle weakness, loss of memory, difficulty in breathing, fatigue, nerve damage, and/or neuropathy, gastritis, esophagitis and/or duodenitis, loss of libido, loss of sexual ability, blood blisters, lung damage.

Medical examinations have been inconclusive insofar as substantiating any injuries except the existence of some taste and smell dysfunction in a few of the claimants. Most of the cases have been settled and none has yet been litigated. The causation of these alleged injuries has not been adjudicated nor has any of the medical information identified a cause. Reports of medical exams as prepared by various examining physicians can be made available by contacting the undersigned.

It is significant that HCPC has had no complaints of these types of injuries from any of its own employees at this plant nor from the employees of the contract maintenance force. In addition, although we have made these same products at other plants, we have had no complaints of this nature from our employees. However, in view of the large number of claims made, we are reporting this information under TSCA Section 8(e), but without any conclusion as to the validity of the claims, or possible causative agent or agents.

The following table further identifies the chemicals referred to in this submission:

Common Name	Chemical Formula	Chemical Abstract No.
Trichlorethylene (TCE)	C_2HCl_3	79-01-6
Tetrachloroethylene (PCE)	C_2Cl_4	127-18-4
Chlorine	Cl_2	7782-50-5
Sulfur monochloride	S_2Cl_2	10025-67-9
Hydrogen Chloride	HCl	7647-01-0

Yours truly,

D. A. Cuthrie
Acting Vice President
Environment, Employee Health & Safety

DAG/db

88-7800146

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

25 MAY 1978

OFFICE OF TOXIC SUBSTANCES

Mr. D. A. Guthrie
Acting Vice President
Environment, Employee Health & Safety
Hooker Chemicals and Plastics Corporation
222 Rainbow Boulvard North
Box 728
Niagara Falls, NY 14302

Dear Mr. Guthrie:

This will acknowledge receipt of your letters of May 12, 1978, transmitting data to EPA under Section 8(e) of the Toxic Substances Control Act. For your information, they have been assigned the document control numbers listed on the enclosed sheet. Any future correspondence regarding these notices should reference the pertinent document control number and be directed to the OTS Document Control Officer, Chemical Information Division, Office of Toxic Substances (TS-793), Environmental Protection Agency, Washington, D.C. 20460.

Sincerely,

Joan Urquhart
OTS Document Control Officer

Enclosure

6

Date	Submission	Document Control Number
5/12/78	TCE; PCE; etc.	8EHQ-0578-0146
5/12/78	high boiling components; low boiling components	8EHQ-0578-0147

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

OFFICE OF TOXIC SUBSTANCES

FEB - 6 1979

Mr. D.A. Guthrie
Acting Vice President
Environment, Employee Health & Safety
Hooker Chemicals and Plastics Corporation
222 Rainbow Boulevard North
Box 728
Niagara Falls, NY 14302

Dear Mr. Guthrie:

With regard to:

TSCA Section 8(e) submission on: C_2HCl_3, C_2Cl_4, Cl_2, S_2Cl_2, HCl

Received from: Hooker Chemicals and Plastics Corporation

Date submitted: 5/12/78

EPA Document Control No.: 8EHQ-0578-0146

The Office of Toxic Substances has made a preliminary evaluation of the above referenced submission under Section 8(e) of the Toxic Substances Control Act (PL 94-469). The enclosed status report is the result of that evaluation. It does not, however, necessarily represent EPA's final conclusion on this submission.

In some cases, we have found that the information contained in the original submission is insufficient to allow a full evaluation of the seriousness of the reported risk. Regarding submission 8EHQ-0578-0146: please submit the medical reports which were prepared by the physicians who examined the exposed workers.

In responding to a request for further information, or in otherwise communicating with EPA regarding a previous submission under Section 8(e), please refer to the EPA Document Control Number assigned to that submission. If further information is to be provided on more than one 8(e) submission, please use separate sheets for each. As in the case of initial 8(e) submissions, all responses will be placed in the public file unless confidentiality is claimed according to the procedures outlined in Section X of the March 16, 1978 policy statement (43 FR 11110). Any confidentiality claims should be supported by submission of information as described in the enclosed item "Support Information for Confidentiality Claims." Any further information requested by this letter should be received by the EPA Document Control Officer within 20 working days of the date of this letter. If you have any questions prior to responding to this follow-up request, please contact Charles Auer of the Assessment Division at (202)-755-2110.

Sincerely,

Joseph J. Merenda
Director
Assessment Division (TS-792)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: June 14, 1978

Approved _____

SUBJECT: Status Report 8EHQ-0578-0146

Revision Needed _____

FROM: Joseph J. Merenda, Acting Director
Assessment Division, OTE/OTS (TS-792)

TO: Warren R. Muir, Deputy Assistant Administrator
for Testing and Evaluation, OTE/OTS (TS-792)

Submission Description

Report describing health complaints voiced by construction workers at a chemical plant in Louisiana. The workers were reportedly exposed to a variety of airborne chemicals including chlorine gas, trichloroethylene, perchloroethylene, hydrogen chloride, and sulfur monochloride (possibly also acrolein, diammonium phosphate, and various hydrocarbons). The workers' complaints included loss of taste and smell, muscle weakness, various neurological disorders, fatigue, and other health problems.

Submission Evaluation

Acrolein as well as all of the chemicals listed in the table on p. 2 of the submission are well-established respiratory irritants. The chlorinated hydrocarbons are also neurotoxins. No data relating to intensity and duration of possible exposure to these chemicals are submitted. Therefore, it is not possible to even guess whether the complaints are related to these compounds.

Current Production and Use

All of the chemicals listed in the submission are relatively high-volume industrial materials. The submitter's Louisiana plant reportedly produces chlorine, perchloroethylene, sodium chlorate, sodium hydroxide, sulfur monochloride, 1,1,2,2-tetrachloroethane, and trichloroethylene.

Related Past and Present Activities

A hazard assessment on trichloroethylene and perchloroethylene is currently underway in the Assessment Division; a CHIP report on acrolein is also available.

NOTE: This status report is the result of a preliminary staff evaluation of information submitted to EPA under Section 8(e) of TSCA. Statements made herein are not to be regarded as expressing final Agency policy or intent with respect to this particular chemical. Any review of the status report should take into consideration the fact that it may be based on incomplete information.

Comments/Recommendations

The submission notes that medical reports on the exposed workers are available; these should be requested from the submitter.

This information as well as any developed subsequently should be referred to NIOSH and OSHA for appropriate follow-up.