

The MBOCA Consortium - EPA HPV Challenge Program Status Report

by Donald P. Gallo, Esq. and Jeffrey A. Morris, Esq.
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As reported in an earlier edition of PolyTopics, the PMA is in the midst of responding to EPA's recent comments on the quality of the MBOCA Consortium's previous test plan and robust summaries for EPA's High Production Volume ("HPV") Challenge Program for MBOCA. In general, the EPA deemed the previous PMA submittals adequate, but determined that some gaps still existed for certain toxicological data. Due to the considerable efforts of Howard Cox and Konagai-sans/Ihara Chemical, the PMA was able to obtain a copy of an additional Japanese study that PMA believes is responsive to EPA's request. The data provided by this Japanese study is critical to our efforts, as it will avoid the need for the Consortium to fund additional expensive testing to satisfy the data required for the HPV Challenge.

The original deadline to submit comments was December 1, 2008, but PMA was able to secure an extension to allow for additional time to allow the documents to be translated. To this end, the PMA retained the services of a Japanese translator to translate the study documents into English; many thanks to Anderson Development, Omni Specialty and Chemtura for funding the translation work. The PMA submitted the translated study to the EPA this week. We expect that it will be several months before we get a response from EPA. We will keep the PMA membership informed of the progress of this important project.

Member Participation Requested for MOCA Use Survey

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In response to a British study that documents what is generally considered significant occupational exposure to 4,4'-methylene-bis (2-chloroaniline) ("MOCA") in the polyurethane industry in British industry workers, the PMA has commissioned a similar survey of MOCA processors in the United States to demonstrate that current preventative work practice measures employed in the U.S. result in much lower exposures than those documented in Great Britain. PMA believes it is important to address the findings of the British study, as MOCA is under intense scrutiny from regulators and experience in the U.S. over many years has shown that MOCA is safe when handled utilizing appropriate workplace measures.

The survey, which is being developed by Dr. Ted Hogan and researchers at Benedictine University in Illinois, is intended to correlate U.S. work practices with actual exposure data from long-term urinalysis studies performed by U.S. processors. The survey will ask for information on handling practices for MOCA, especially with regard to practices recommended by PMA in the MOCA Use Document regularly provided by MOCA distributors and also readily available to PMA members.

The PMA has distributed copies of Dr. Hogan's survey to processor members. Your response to the survey will be critical to documenting the safety of MOCA and demonstrating to U.S. regulators that existing occupational controls are adequately protecting worker health.

PMA will make every effort to maintain the survey data as confidential, both for the protection of members and the integrity of the study. Company names will not be placed on the survey and will not be used in any report of the findings; rather, each company will be assigned a numerical code that will be known only by PMA staff. If you have any questions regarding the survey or the survey process, please call Jane Svinicki or Jennifer Rzepka of PMA at 414-431-3094.

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