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March 15, 1962

Dr. Marcus Key U. S. Public Health Service Division of Occupational Health 1010 Broadway Cincinnati 2, Ohio

Dear Dr. Roy:

Confirming our telephone conversation, I am forwarding a copy of our Technical Bulletin No. PL-306 entitled "Aroclor Plasticizers." On pages 48 and 49, we have summarized our available data relating to possible skin effects if the Aroclors are misused.

You will note that in the first paragraph under "Dermatology and Toxicology" on page 48, we state, "When Aroclor compounds are used at elevated temperatures, engineering controls must be applied, either by the use of closed systems or by effective local-exhaust ventilation together with general workroom exhaust."

Again, in the last paragraph on page 48, we make reference to avoiding skin contact. In the section on "Safe Handling" at the top of page 49, we again point out the necessity for avoiding exposures, particularly when the Aroclors may be used in applications where elevated temperatures are involved.

As I told you on the telephone, our experience and the experience of our customers over a period of nearly 25 years, has been singularly free of difficulties. To our knowledge, there have been only three instances where chloracne has occurred. In view of the millions of pounds which have been produced and used in many and varied applications, the low

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frequency of any difficulties has been gratifying. I am sure that the earlier problems with mixtures of the Aroclor and chlorinated napthalenes were in part, responsible for the subsequent trouble-free experience. Certainly we have attempted to provide sufficient information to insure safe handling and usage. We have not in any case attempted to minimize potential hazards.

We have carried out screening toxicological tests on many of the lower Aroclors. We have, likewise, carried out extensive inhalation tests on Aroclor 1248 and 1254. Because of the physical nature of 4455 and the fact that we had no reports of any exposures or difficulties, we have not carried out any toxicological experiments on this compound. I would, however, assume that it has the same toxic character as the lower Aroclors. Therefore, if sufficient material were inhaled, liver problems would develop.

If you have any further questions, please let me know.

Very truly yours,

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R. Emmet Kelly, M. D. Medical Director Medical Department

REK: sg Enclosure

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