

19 August 1981

Dr. Hervey B. Elkins
Chairman, Chemical Substances TLV Committee
American Conference of Governmental Industrial
Hygienists
Box 1937
Cincinnati, Ohio 45201

Dear Dr. Elkins:

I am responding to your invitation in the Preface of the Fourth Edition of the "Documentation of the TLV" to offer a proposed correction to an otherwise excellent support document on vinyl chloride.

The second paragraph of page 428 contains a discussion of the report of Tribuk, et. al., which is ascribed to "injury during the production of polyvinyl chloride." I agree that the title of this article, which often is the only translated portion seen by most reviewers, does read "Working Conditions and Measures for Their Improvement in Production and Use of Vinyl Chloride Plastics," so it is an understandable mistake to assume that the production of PVC is included. However, the authors actually state "we studied the working conditions at the finishing of vinyl chloride plastics under factory conditions..." It is apparent from the next paragraph that "production" refers to what we normally term "fabrication," the processing of the resin, not its preparation.

It is uncertain if Russia actually had any PVC production facilities at that time; most observers think not. In any case, it is apparent from the garbled description given in this paper that the authors are not familiar with the preparation or polymerization of vinyl chloride, and they state that that is not the process which they reported on in this paper.

The only reason that I consider this relatively trivial matter worth discussing is that the Tribuk paper has been held up on several occasions as a reason why PVC manufacturers should not have been so callous as to allow their workers to be exposed to high vinyl chloride concentrations until deaths were observed in 1973. Actually, as your summary shows, the data leading to the discovery of the chronic toxicity of vinyl chloride was developed by the PVC industry, primarily Dow, the employer of Torkelson, et. al., and Mutchler; Solvay, the employer of Viola; and various industry



Dr. H. B. Elkins

Page 2

19 August 1981

trade associations, who sponsored the studies of Dinman, Maltoni, and Tabershaw-Cooper. Furthermore, as the Tribuk report did not deal with a polymerization plant, and emphasized the problems due to chlorinated aromatics, it was not relevant to PVC plants.

I hope that it will be possible for this error to be corrected in future versions of the ACGIH publications. We have all come to respect the high level of accuracy of this organization, and look to it as the primary reference for health matters.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'John J. Barr', written over the typed name.

John J. Barr
Manager, Regulatory Response

JTB/sfw

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