



Air Products and Chemicals, Inc.

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(215) 481-4911

10 August 1982

Mr. R. C. Barnard
Cleary, Gottlieb, Steen & Hamilton
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036

Dear Bob:

Further to my note of 2 August on the Zeise, Wilson and Crouch proposal, I have tried, without success to follow their mathematical examples. The raw data are missing, and there seems to be some errors in the draft. Thus, I have prepared a simple table of toxicities and made a few calculations based on their reported risk from vinyl chloride. The results are attached.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'J. T. Barr'.

John T. Barr
Manager, Regulatory Response

JTB/sjw

Enclosure

AP00051456

<u>Substance</u>	<u>Oral Rodent LD₅₀, g/kg</u>	<u>Wilson Potency</u>
Vinyl Chloride	26-39	10 ⁻⁴
Sucrose	30	
Saccharin	14-18	10 ⁻⁴
Ethanol	6-8	
Citric Acid	5-12	
Sodium Chloride	3-8	
Acetic Acid	3-5	
Vitamin A	2-4	
Aspirin	1	
Urea	0.5	
Ascorbic Acid	0.5 (iv)	
Ammonia	0.35	
Formaldehyde	0.06	0.08-1.7
TCDD	0.02-0.04x10 ⁻³	765-5800



Air Products and Chemicals
INC

CHEMICALS GROUP

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December 28, 1975

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John Lawrence
Society of the Plastics Industry, Inc.
355 Lexington Ave.
New York, N.Y. 10017

Gentlemen:

I thought you would be interested in the attached letter we received from Barry White of OSHA in response to our request for a redefinition of "fabricated product."

The third paragraph of the letter is very significant, and means that PVC resins and compounds with very little residual VCM will be "fabricated products" and will, therefore, be exempt from the labelling requirement. It also means that fabricators who use such low residual VCM product exclusively will be exempt from the OSHA standard.

Very truly yours,

Raymond H. Schenck
Raymond H. Schenck
Attorney

RHS*swc
cc: A. R. Adams
J. T. Barr

AP00051464