The Vinyl Institute

A Division of The Society of The Plastics Industry, Inc.

For information.

RTG

Roy T. Gottesman
Executive Director

May 16, 1989

Mr. Keith Lessner
Director, Loss Control Department
Alliance of American Insurers
1501 Woodfield Road, Suite 400 West
Schaumburg, Illinois 60173-4980

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Sherry M. Carr

Dear Mr. Lessner:

Ms. Deborah Neale, Director of Governmental Affairs for the BFGoodrich Company, one of the member companies of the Vinyl Institute, recently talked with Mr. Bradley Cading of your organization about concerns we have about inaccurate information in your publication "Chemical Hazards with Building Materials" relating to PVC or polyvinyl chloride products. Mr. Cading suggested that I contact you directly on this matter.

I recently was made aware of your publication and noted two grossly inaccurate statements which, if allowed to go uncorrected, could be extremely damaging to the vinyl industry. I have reference to the following:

1. Page 10 - The last paragraph reads....

"Polyvinyl chloride (PVC) plumbing connectors and pipe contain solvents. PVC materials in plumbing systems should not be used more than necessary, especially in hot water supply. The water in plumbing systems in which PVC components are installed should also be pH-neutral and characterized by minimal chlorination. (19)"

Your reference for this is given as "Hal Levin and Associates, personal communication (July 1988)". I am not familiar with this organization or its area(s) of expertise.

There is a factual error in each sentence of that paragraph. First, PVC plumbing connectors (presumably you mean fittings such as "T"'s and "elbows") and pipe do not contain solvents. Solvent cements are used to join pipe and fittings but these do not result in any hazards. It is generally recommended that water be flushed through a newly-installed piping system for about 30 seconds to remove any solvent traces.

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I do not understand the basis for the statement that "PVC materials in plumbing systems should not be used more than necessary". Over 3 billion pounds of PVC was used in 1988 for fabrication of pipe used to convey water and sewage and in plumbing, drain, waste and vent applications.

In leaching studies conducted by the State of California at the University of California at Berkeley and in other tests conducted for the Vinyl Institute, there was no indication that any hazardous materials are leached from PVC pipe. Chlorinated PVC pipe (CPVC) is approved for delivery of hot water. Your statement is both inaccurate and irresponsible.

Finally, because of its outstanding chemical resistanc , the "pH-neutral" limitation you suggest has no validity. In fact, metal pipe at low-pH poses a genuine problem in that copper and/or lead are dissolved into the water.

I am enclosing a technical information sheet entitled "PVC Pipe and Drinking Water Safety" as well as a copy of an article which appeared in the New York Times on Sunday, April 30, 1989, both of which give further information to support our position that PVC pipe is a very safe material and that the information in your publication is inaccurate.

2. Page 15 - The following statement appears in the second paragraph:

"A toxicity researcher in the early 1980's demonstrated, for example, that five feet of vinyl conduit wrap emits sufficient gas to kill everyone in an average bedroom in about 10 minutes. (26)"

Not only is this allegation unsupported by extensive scientific data developed in the past few years, it completely ignores the fact that PVC conduit is installed behind fire-rated walls and would be the last of the building components to become involved in a fire.

It further shows a lack of understanding that in a fire scenario, the hazard of a product is determined not only by the toxicity of the smoke but other factors that are equally or more important such as ease of ignition, flammability, amount and rate of heat release and smoke production.

I am enclosing a technical information bulletin from the Vinyl Institute published last September which provides extensive information and a comprehensive list of references dealing with the "Fire Properties of Polyvinyl Chloride".

I am certain that these inaccuracies are inadvertent. I am equally certain that the Alliance of American Insurers wants to provide

accurate reliable information to its member companies and their clients.

Because of this, I would appreciate learning from you how you plan to correct these errors which, while unfortunate, can be damaging to vinyl industry members.

I look forward to hearing from you.

Sincerely yours,

Roy D. Gotteman

RTG/pmb

cc: Ms. Deborah Neale, BFGoodrich
Mr. Bradley Cading, Alliance of American Insurers
Peter L. de la Cruz, Esq., Keller and Heckman (VI Counsel)