

The BFGoodrich Company
3925 Embassy Parkway
Akron, Ohio 44313-1799

72 AN 29-10
AN 320

File: Vinyl Chloride
VCM: Health Effects

December 12, 1989

Carlo H. Tamburro, M.D., M.P.H.
University of Louisville
School of Medicine
Health Sciences Center
Louisville, KY 40202

Dear Dr. Tamburro:

At your request I am enclosing comments on the the "Case Studies In Environmental Medicine Vinyl Chloride Toxicity".

Please call me at (216) 374-4534 if you have any questions.

Sincerely,

THE BFGOODRICH COMPANY

Robert R. Hendon

~~Robert R. Hendon~~ Ph.D.
Manager, Toxicology
Health and Environmental Services

91212-3/jp

cc: H. W. Dietz, M.D.

SPI-01196

COMMENTS ON:
CASE STUDIES IN ENVIRONMENTAL MEDICINE ON VCM

1. Page 1, Paragraph 2

The scenario that the subject has noticed an odor due to VCM in his backyard is not realistic. The odor threshold for VCM is 300 ppm which is far above any level experienced on an occasional basis. Community exposure levels are at most in the low ppb to nondetectable range. Only a catastrophic loss could result in community levels in the hundreds of ppm range and this would be a very rare event.

2. Page 2, Paragraph 3

The 1-10 ppm levels of VCM in cars was demonstrated under worst case and/or artificial conditions. Because of the finite levels of VCM in the polymer, such levels are not expected to occur. This statement also inaccurately suggests that such levels are expected to occur frequently.

3. Page 2, Paragraph 3

The combustion of PVC does not release VCM.

4. Page 2, Paragraph 4

Residual VCM in pipe is available for leaching into drinking water. However, numerous studies under static and dynamic conditions have shown that VCM is not detectable.

5. Page 4

The data as a whole indicates that VCM is not a teratogenic hazard (Attachment 1). However, rodent studies indicate that the fetus may be at increased risk to cancer.

6. Page 5, Chronic Exposure

No non-malignant liver tumors have been associated with VCM exposure. Furthermore, while some studies have suggested that VCM may cause other tumors. The epidemiology studies on VCM as a whole do not support an association at other sites (Doll, 1988; Attachment 2).

7. Page 15, Food

This highlighted section should note that the FDA limits are now only proposed, not mandatory limits.

91211-5/jp

SPI-01197