

September 4, 1968

Mr. J. L. Jacqmain  
Amway Corporation  
7575 East Fulton Road  
Ada Michigan 49301

Dear Mr. Jacqmain:

I will reply serially to the questions about Aroclor 1254.  
included in your letter of August 23.

1. The oral LD<sub>50</sub> in rats when administered undiluted was approximately 12,000 mg/kg of body weight.
2. When applied undiluted to the skin of rabbits the minimum lethal dose was between 1260 and 2000 mg/kg. When applied as a 4% solution in corn oil consecutively for 20 days the mean lethal dose was approximately 75 mg/kg. These data indicate that the undiluted material is not readily absorbed through the unbroken skin, whereas when in a solution in oil penetration of the unbroken skin is significant.
3. We have not done the gross animal skin irritation and eye irritation potential studies. As far as skin contact is concerned we have never had any particular problems during the manufacture of the material nor have we had reports from users of skin reactions.
4. We do not know of any significant hazards in connection with the industrial use of Aroclor 1254 as long as our recommended handling precautions are observed. For example, we recommend good mechanical exhaust ventilation control of any vapors that might be liberated if Aroclor 1254 is heated. We recommend that repeated and prolonged skin contact be avoided. This is because members of the Aroclor series of products can be absorbed through the unbroken skin and cause systemic injury. Secondly, the liquid

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Aroclors are relatively good solvents for the protective fats and oils in the skin. Continuous or prolonged exposure then can lead to drying and chapping of the skin.

5. About 20 years ago 200 humans subjected to the Schwartz and Peck patch test procedure resulted in only one individual with a positive reaction. There was no reaction on retesting in this individual 10 days later nor did any of the other subjects show any reaction on retesting thus indicating that Aroclor 1254 is not a sensitizer.

We are not aware of the use of Aroclor 1254 in any consumer product although it is possible that it has been used in latex-type paints for outdoor applications. I am sure that our Medical Director, Dr. Kelly, and I would have to know the type of consumer product and use contemplated before we could express an opinion as to the advisability of including Aroclor 1254 in a consumer product.

Sincerely,

Elmer P. Wheeler  
Manager, Environmental Health

EPW:cjs