

Interoffice Communication

JF - AMB

To John Friend, Al Sather

From J. J. Hall

Date May 7, 1982

Subject NIOSH EXPOSURE STUDY FOR DEHP

The attached letter from Keller & Heckman explains NIOSH's intent to do an exposure study on DEHP. I would expect this study, if properly conducted, to verify what we already know -- exposure levels are very low.

The CMA Phthalate Committee has already met with NIOSH to explain some of the possible pitfalls.

Please let me know if you are contacted by NIOSH.

J. J. Hall

ajc

Attachment

cc HRF, SKS

RECEIVED

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MAY 07 1982

LAW OFFICES
KELLER AND HECKMAN

1150 17TH STREET, N. W.

SUITE 1000

WASHINGTON, D. C. 20036

(202) 457-1100

JOSEPH E. KELLER
JEROME H. HECKMAN
CHARLES M. NEEHAN
WILLIAM H. BORGHESE, JR.
ROBERT R. TIERNAN
MALCOLM G. MACARTHUR
WAYNE V. BLACK
DAVID L. HILL
MARTIN W. BERCOVICI
JOHN S. ELDRED
CAROLE C. HARRIS
MICHAEL F. MORRONE
LARRY S. SOLOMON

JOHN B. DUBECK
CHRISTINE A. MEAGHER
SHIRLEY S. FUJIMOTO
PETER L. DE LA CRUZ *
LAWRENCE P. HALPRIN
DEBORAH SHUR TRINKER
C. DOUGLAS JARRETT
EDWARD L. KORWEK
ROBERT L. FLESHNER
JONATHAN P. LEVINE
SHEILA A. MILLAR
RUSSELL H. FOX
LEE M. WEINER

TELECOPIER
(202) 296-7682

CABLE ADDRESS "KELMAN"

WRITER'S DIRECT DIAL NUMBER

(202) 457-1110

* OHIO BAR ONLY

May 4, 1982

To: SPI--Food, Drug, and Cosmetic Packaging
Materials Committee
SPI--Polymeric Materials Producers Division
SPI--PVC Safety Group

Re: DEHP; NIOSH Exposure Study

Ladies and Gentlemen:

We have just been informed that the National Institute of Occupational Safety and Health (NIOSH), under the impetus provided by the carcinogenesis bioassay of di(2-ethylhexyl) phthalate (DEHP) is turning its attention to the question of occupational exposures to this chemical. More specifically, our understanding is that NIOSH is undertaking a feasibility study to determine whether industrial exposures to DEHP are near the currently permitted level of 5 mg/M³ * / time weighted average (TWA) or whether they are significantly below this level. If occupational exposures are adequately low, NIOSH will recommend that no further attention be given to this matter; if the feasibility study indicates the possibility of undesirably high exposures, a more comprehensive survey of exposure levels as well as possible health effects will follow. As always, the ultimate objective is preparation of a report for the Occupational Safety and Health Administration (OSHA) which will undoubtedly give NIOSH's recommendations as to whether new standards need to be developed to assure worker safety.

* / Milligrams of particulates per cubic meter of air. 29 C.F.R. § 1910.1000, Table Z-1.

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So that you will have all of the background available on this matter, on Friday, April 30, and again on Monday, May 3, we were contacted by Dennis Roberts of NIOSH's Industrial Hygiene Section in Cincinnati. Mr. Roberts noted that the National Toxicology Program (NTP) recently announced the availability of the final report of the carcinogenesis bioassay of DEHP. This report concluded that "[u]nder the conditions of this bioassay, di(2-ethylhexyl) phthalate was carcinogenic for F344 rats and B6C3F1 mice . . ." Combined with the knowledge that DEHP is used extensively in the plastics industry, the report led NIOSH to direct its attention to the levels of occupational exposure to DEHP with a view to determining whether these levels of exposure pose any health concerns.

In response to Mr. Roberts queries as to where DEHP is used in the plastics industry, we informed him that the major use in the industry is in the preparation of some--but by no means all--flexible polyvinyl chloride (PVC) products. We also informed him that The Society of the Plastics Industry, Inc. (SPI), as a matter of policy, would cooperate with NIOSH in any reasonable way but that we were unable to tell him which companies utilize DEHP in their formulations; it was suggested that he refer to some of the standard references for information on users of DEHP or suppliers of plasticized products.

X (We were requested by Mr. Roberts to notify the industry, to the extent possible, of the NIOSH interest so that commercial users of DEHP will not be surprised if they receive inquiries from the Agency. The inquiries will ask whether DEHP is used and exposure levels may be measured. In this connection, Mr. Roberts noted his awareness of the need to exercise great care because of the potential for accidental DEHP contamination of samples that are not properly taken and analyzed.

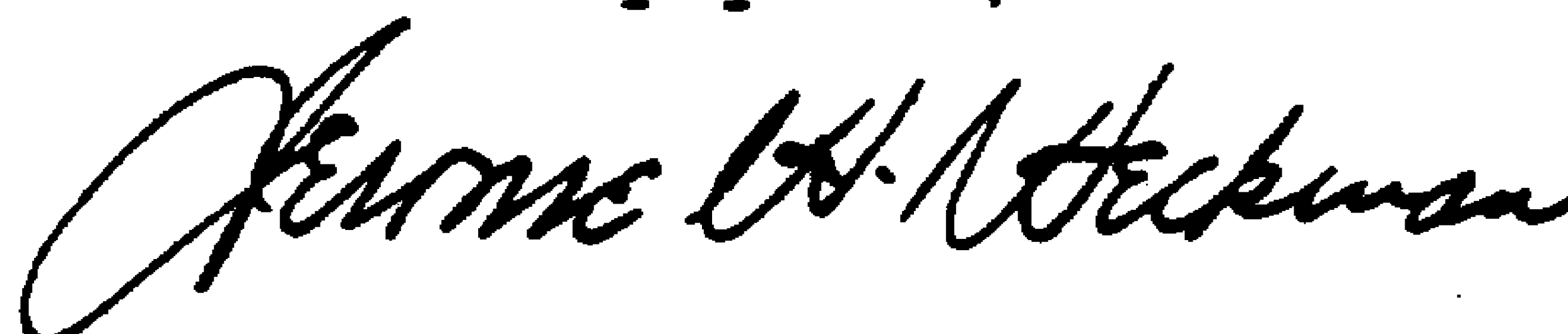
This is all the information we have at this time but we will make every effort to follow the progress of this program

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and keep you fully informed. By the same token, we would welcome any information that any of you can provide, particularly if you are contacted by NIOSH personnel.

Cordially yours,

A handwritten signature in cursive script, reading "Jerome H. Heckman". The signature is written in dark ink and is positioned above the printed name.

Jerome H. Heckman

cc: Mr. Dennis Roberts