



*Signature*  
12/1/82  
EOIC

Conoco Chemicals Company  
A Division of Conoco Inc.  
15990 North Barker's Landing Road  
P.O. Box 19029  
Houston, TX 77224

January 25, 1983

Mr. Wes Jordan  
Becton and Dickinson Company  
Mack Centre Drive  
Paramus, NJ 07652

Dear Wes:

Below are my comments on the industrial hygiene section of the EOIC draft EO Risk Assessment document.

1. In the first paragraph of Page 2, it should be clearly stated that the 1.0 ppm TLV for EO appears in the "Notice of Intended Changes" list for 1982 and has not yet been changed. As you know, we plan to make a presentation to the TLV committee and the final change may not be 1.0 ppm.
2. In the third paragraph of Page 2, I feel it should be made much clearer that biological monitoring techniques are not proven or understood at this point. In other words, we should strongly indicate no meaningful biological monitoring techniques are available at this time.
3. On Page 6, the last sentence of the first paragraph should be deleted. I think for this document the sentence is too editorial in nature.
4. On Page 9, the second paragraph deals with exposures to sterilizer operators. It is not clear to me if the exposures between 5 and 40 ppm have been "measured" or if this is an estimate.
5. On Page 10, the second paragraph should more accurately describe the problem with NIOSH approval of an EO respirator.

I am sending these comments to you per Carol Stack's request in her letter of 1/12/82. Please let me know if you have questions concerning the above.

Sincerely,

Thomas G. Grumbles, Director  
Industrial Hygiene

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cc Carol Stack

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