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UNIROYAL, Inc.  
World Headquarters  
Middlebury, Connecticut 06749

February 1, 1980

Docket Officer  
Docket H-034  
Room S6212  
U. S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

Re: Vinyl Chloride

Dear Sir:

This is in response to the December 18th Federal Register (pages 74928-74929) request for information on vinyl chloride and polyvinyl chloride.

Uniroyal operated a PVC plant at Painesville, Ohio from approximately 1949 until the present OSHA standard went into effect when the plant was closed because it was not economical to update it to meet the standard.

For a number of years Uniroyal and the United Rubber Workers have had a joint Occupational Health Studies contract with the University of North Carolina Health Studies Group. They have conducted an epidemiological study of the Painesville plant which was updated in 1979. A copy of the study is enclosed.

To date we have not had any case of hemangiosarcoma. It is interesting to note that of 34 cases in North America, 31 have occurred at four factories out of a total of 53 factories. It is also of interest that nine out of ten cases at Shawinigan (Canada) were smokers or ex-smokers. Canada is the only country for which we have such information. Incidence in North America seems to be on the decline in spite of the rapid growth of the industry in the 50's. Although it is impossible to prove, it is still my opinion that cancer would never have been associated with vinyl chloride if exposure had been limited to a time weighted eight hour per day exposure of 50ppm from the beginning.

On page 1 of the 1979 report mention is made of the alleged brain cancer cases at Union Carbide. At a recent meeting I

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was led to believe that these individuals were not peculiarly associated with vinyl chloride. This point should be checked carefully.

Because the data for cancer are not statistically significant no follow-up case control study has been carried out.

Please let me know if we can be of further assistance.

Very truly yours,

*Walter D. Harris*  
Walter D. Harris, Ph.D.  
Corporate Industrial Toxicologist

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