

was at low cost, he posed himself from his literary pharmacopoeia, taking potions which were good for his spiritual ailments.

anything. But I take good medicine for the illnesses of the spirit which, as Dr. Howard suggests, are inevitable.

Among these obviously picturesque people, cattle are not kept for meat or primarily even for sale but for social prestige.

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PLAIN DEALER - Wednesday, July 24, 1974

Forum feedback: the vinyl chloride column

The July 15 article by Jeff Stansbury and Edward Flattau on the problem of worker safety in the use of vinyl chloride is incorrect in several respects.

Stansbury and Flattau said that Dow Chemical Co. told the Occupational Safety and Health Administration hearing examiners that it was already complying with the proposed "no detectable" level and this undercut other manufacturers' claims. I attended the hearings, and I have reviewed the Dow testimony. I can categorically state that Stansbury and Flattau are wrong. Dow did not say it can achieve the "no detectable" level in any of its facilities except in certain job areas. It was also brought out quite clearly in the cross examination that Dow is not a PVC producer but runs a different type of polymer plant with different types of problems. Dow is a vinyl chloride monomer producer.

Thus, Dow's testimony did not undercut other manufacturers' claims. As a matter of fact, Dow's testimony strongly supported the claims of other manufacturers that the non-detectable level is not necessary for the health of workers.

Stansbury and Flattau were also incorrect in saying that the other manufacturers felt they would need at least three years to meet the proposed standards. The Society of the Plastics Industry, speaking for most of the manufacturers of PVC and vinyl chloride monomer, indicated that they did not know how to meet the proposed standard. Instead, they recommended adoption of a standard tougher than that which is currently in existence but far different from the proposed standard—and this would be achieved over a three-year period.

I would again call to the editor's attention that Stansbury and Flattau are inaccurate reporters. One gets the impression that they are twisting the facts to suit their particular point of view in a way that is not ethical. I would recommend that The Plain Dealer discontinue their column. Each time they have written about something with which I am familiar, I have found them to be grossly inaccurate.

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Stansbury and Flattau use half-truths, misrepresentations and erroneous assumptions to support a preconceived conclusion.

The problem of exposure to possibly dangerous levels of vinyl chloride monomer in the plastic industry demands the concern of labor, management and government. Inflammatory columns like that of

Stansbury and Flattau perform a great disservice at a time when sound, reasoned judgments based on scientific evidence must prevail over emotion.

I attended the recent Department of Labor hearings in Washington, D.C., on vinyl chloride monomer exposure and listened to the evidence presented by labor, management and government. In considering the statements by Flattau and Stansbury I can only speculate as to whether these gentlemen saw fit to attend the hearings.

Several points require clarification:

- Industry has stressed that the matter of prime concern in regulating exposure to vinyl chloride monomer is the health and safety of employees.

- The economic issue involved is not the cost of engineering or work practice changes reasonably necessary to reduce exposure to vinyl chloride monomer, but rather the total economic ramifications which would result from imposition of a standard for which the technology does not exist.

- Industry's criticism of the proposed federal standard for exposure to vinyl chloride monomer is based on technological feasibility.

- The reduced exposure levels advocated by the industry represent the lowest levels possible with present technology.

- There is no scientific evidence that the dramatically reduced exposure levels proposed by industry constitute any health hazard to employees.

- Stansbury and Flattau rely on the testimony of Dow Chemical Co. for the proposition that the proposed reduction of vinyl chloride monomer exposure to "no detectable" levels in the workplace is technologically feasible. In point of fact what Dow indicated was that it has obtained some "no detectable" levels at some locations in some plants. The same can be said of many companies.

What Stansbury and Flattau chose to ignore was the Dow testimony on page 892 of the hearing transcript: "In modern-engineered plants, with continuous monitors airborne levels (of vinyl chloride monomer) can be minimized but not eliminated;" and on page 901: "Well, I have concluded that it is technically infeasible to get to a no-detectable limit of vinyl chloride monomer by Oct. 5, 1974."

Stansbury and Flattau also imply that Dow's reduced exposure levels were achieved overnight. The evidence is clear that for reasons other than the recently discovered suspicion of vinyl chloride monomer as a cancer-producing agent, Dow has toiled for over 10 years to achieve the exposure levels presently found in its facilities.

- Stansbury and Flattau imply that industry's response to the possible hazards of exposure to vinyl chloride monomer has been to raise thinly veiled economic threats and sit back. Nothing could be further from the truth. It was industry itself that brought the possible hazards of vinyl chloride monomer exposure to the attention of the federal government.

As a relative newcomer in my association with the plastics industry, I was amazed by the dramatic and decisive action taken by the industry to reduce exposures to vinyl chloride monomer immediately on becoming aware that it posed a possible health hazard to employees. This action was taken voluntarily without government requirement.

The evidence does not support the indictment of industry leveled by Stansbury and Flattau.

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