

Medical, A2SA

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Mr. H. J. Corbett - E3SH
Dr. George Roush, Jr., -A2SA
Mr. M. C. Throdahl - D1D
Mr. E. P. Wheeler - A2SA

Mr. Phocion S. Park
A3SH

The following are my recommendations on changes in the proposed Monsanto response to the OSHA Permanent Standard for VCM Exposures:

I would add this sentence at the end of the third paragraph on the first page, "We know that the level of VCM in the working area during this time was considerably over the no detectable level."

I would change the tense of the verb "endorse" in the fourth paragraph on the first page to the past tense if you are going to use it at all. That sentence would read, "we endorsed OSHA's temporary standard, etc."

I would remove the two last sentences from paragraph one, page three. The implication of the sentence starting "Were it not for the extremely rare nature of angiosarcoma, etc." would lead one to the conclusion that if the tumors are not found there is really no great problem. The last sentence, "The level of 19 deaths during this span of time represents an insignificant number" would kill us if it were taken out of context. A Nader type could say with some logic, "Monsanto considers 19 deaths from cancer an insignificant number."

The first sentence in paragraph two on page three is open to some argument. Tabershaw Cooper found an excess amount of angiosarcomas in the workers and it would be hard to say this is not an adverse effect. I think it would be safer for us to substitute the phrase "from the standpoint of increased mortality" at the end of that first sentence in paragraph two.

On page four in paragraph four, we advise continuing exposing workers to 50 ppm. I don't see how we can sweep the animal data at 50 ppm under the rug. I think we can change the last part of the sentence from "At the current exposure limit of 50 ppm" to "under 50 ppm but not 0."

On page five we are again equating economic loss to the occurrence of cancer. This is stated in the sentence starting "In view of this economic loss, etc." I think we can accomplish the same purpose by taking out the phrase "the low incidence of angiosarcoma in PVC workers" and substituting "the general good health record of PVC workers and the absence of angiosarcomas in many PVC manufacturing locations." "We recommend maximum reduction of VCM exposure consistent with feasible manufacturing practices." I would drop the last sentence entirely. We have no basis to state that 50 ppm is

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safe for workers. We know we are fighting a losing battle to try to keep it at that level. We might substitute "we recommend the adoption of a permanent standard at a level similar to those currently occurring in industry where no cases of angiosarcoma have occurred."

We have to realize that this is going to be a public document and will not be quoted in whole, but in part. We will just have to be as circumspect as we can in not getting out on a limb in making statements that might show we are on the side of cancer when dollars are concerned, or that we are advocating a standard for which we have no basis.

R. Emmet Kelly, M. D.

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