



*Penney, Harris
Sherman, Wendy*

CHEMICAL MANUFACTURERS ASSOCIATION

Vinyl Chloride Health Committee

FAX

March 11, 1998

TO:	COMPANY:	PHONE:	FAX:
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Mr. Mark Gruenwald	Borden, Inc.	(614) 225-3459	(614) 225-7639
Dr. Steve Phillips	Occidental Chemicals	(972) 404-2413	(972) 404-3287
Mr. Caffey Norman	Patton Boggs, L.L.P.	(202) 457-5270	(202) 457-6315
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Dr. David Penney	CONDEA Vista Company	(281) 588-3059	(281) 588-3478
Mr. David Pun	Formosa Plastics	(973) 716-7279	(973) 716-7283
Mr. Jay Strange	Georgia Gulf Corp.	(504) 685-2642	(504) 687-0294
Lee Larson/ Woody Ban for E. Beeler	GEON Company		(440) 930-3830

FROM:			
Wendy K. Sherman	CMA	(703) 741-5639	(703) 741-6091

MESSAGE

Attached is the draft verification letter from Caffey Norman. Please make any changes/comments directly to Caffey Norman (phone and fax listed above) by Monday, March 16, 1998, 12:00 noon. Due to Panel members' traveling schedules, this letter will be sent to EPA on Monday (3/16) late afternoon. If you have any questions, please call me at 703/741-5639. Thank you.

SENDER: Cynthia Barrett
PHONE: 703/741-5642
PAGE(S) 5 (including cover)

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March 10, 1998

MEMORANDUM FOR THE VINYL CHLORIDE PANELRe: AEI Results

As discussed on the conference call this morning, attached for your review is a draft letter notifying EPA of AEI's baseline results under § 8(e) of the Toxic Substances Control Act.

Please let me know right away if you identify any changes needed. Wendy intends to submit notification to EPA by the end of this week.

Caffey Norman
W. Caffey Norman, III

Attachment

004602.002

3/10/98 DRAFT

March __, 1998

Document Processing Center
Environmental Protection Agency
Room E-G99, Mail Code 7407
Office of Pollution Prevention and Toxics
401 M Street, S.W.
Washington, D.C. 20460

Attention: TSCA § 8(e) Coordinator

Dear Sir:

The Vinyl Chloride Panel of the Chemical Manufacturers Association submits the enclosed preliminary results from an ongoing update of an epidemiology study of vinyl chloride last followed up by Wong *et al.*, Am. J. Ind. Med. (1991) 20(3): 317-34. These results are submitted pursuant to Section 8(e) of the Toxic Substances Control Act.

The enclosed tables represent the study contractor's baseline results compared to the results reported by Wong *et al.* According to the contractor, the current cohort differs from that analyzed by Wong *et al.* in that numerous errors are identified and corrected, several hundred cohort members not included in Wong *et al.*'s analyses have been restored, and some additional deaths have been discovered.

Three columns of results are presented in each table; the first column contains results based on the cleaned and expanded cohort using U.S. mortality rates as the reference (methodologically most comparable to Wong *et al.*'s results); the second contains results using rates for the states in which each plant was/is located; and the third reflects Wong *et al.*'s results. Almost universally, the update results mirror those of Wong *et al.* Most exceptions are due to some rearrangement of specific causes of death within broader disease categories, often reflecting the way deaths are coded over different time periods and in different states (*e.g.*, liver cancers and cardiovascular disease deaths).

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The standardized mortality ratio (SMR) for "connective and soft tissue" cancers is significantly elevated (SMR=381 using the U.S. reference rates (95% confidence interval (CI) 153 to 785) and SMR=367 using state reference rates (95% CI 147 to 755)), based on seven observed deaths due to these cancers. This association has not been reported elsewhere to date.

Biologically, the observed excess might be related to the well-known association between vinyl chloride exposure and angiosarcoma of the liver, as angiosarcomas (tumors of the blood vessels) occurring outside of the liver are classified as soft tissue sarcomas. On the other hand, deaths due to angiosarcoma of the liver but erroneously recorded on a death certificate simply as "angiosarcoma" without specifying "of the liver" will be classified as a soft tissue sarcoma as well. Unfortunately, it is not possible to determine from the death certificate whether this has occurred.

The SMR for cancers of the "peritoneum and other digestive organs" is also significantly elevated (SMR=302 using U.S. reference rates (95% CI 98 to 706) and SMR=274 (95% CI 89 to 640)), based on five observed deaths due to these cancers. The study contractor has indicated that each of the five cancers observed is a different type of cancer with a different etiology. In light of the absence of consistency of these cancers, the contractor advises that this observed excess is unlikely to have any biological significance.

The member companies of the CMA Vinyl Chloride Panel on whose behalf this submission is being made include:

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If you have any questions regarding this letter, please contact Wendy Sherman of my staff at (703) 741-5639.

Sincerely,

Courtney M. Price
Vice President, CHEMSTAR

Enclosure

cc: Vinyl Chloride Panel
Director, Office of Compliance Monitoring

004602.005