

MANUFACTURING CHEMISTS ASSOCIATION

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W. A. K
JUL 24 1974

July 16, 1974

Docket Officer Docket OSH-36
U. S. Department of Labor
Occupational Safety and Health Administration
Room 230, 1726 M Street
Washington, D. C. 20210

Dear Sir:

During the testimony on the proposed OSHA standards for vinyl chloride, and at the request of participants in those hearings, the Administrative Law Judge asked that certain materials pertaining to MCA-administered research on vinyl chloride be submitted for inclusion in the record.

In response to these requests, we are submitting herewith three copies of the following documents, and ask that they be entered as exhibits in the record:

Item 1 - Initial protocol for the chronic inhalation study of vinyl chloride, incorporated in the agreement between MCA and the Industrial BIO-TEST Laboratories, Inc. dated February 2, 1973.

Item 2 - Letter dated April 27, 1973 amending the initial agreement to provide for the addition of Exposure Group TE IV, 100 rats to be exposed to 5,000 ppm vinyl chloride with food and water present in the chamber during the hours of exposure.

Item 3 - Letter of Dr. John W. Goode, dated August 2, 1973 requesting authorization to terminate initial exposure experiments, and to restart them with new animal groups.

Item 4 - Letter of Mr. A. C. Clark, dated August 3, 1973 authorizing IBT to restart the animal exposure experiments.

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Item 5 - Revisions to experimental protocol, providing for reductions in the levels of vinyl chloride exposure for the new experiments, in accordance with MCA's authorization dated August 31, 1973.

Item 6 - IBT's first quarterly progress report, submitted under cover letter dated October 13, 1973 and distributed to project sponsors by MCA, October 30, 1973.

Item 7 - IBT's "90-Day Status Summary Report", dated February 1, 1974 on the restarted animal exposures.

Item 8 - MCA's summary to the sponsors of IBT's oral progress report made February 20, 1974 and the tabular data submitted with that report.

Item 9 - MCA report to its sponsors of the conference and oral report of IBT on April 15, 1974 on the appearance of tumors among the mice exposed to vinyl chloride, together with tabular data submitted at that conference.

Item 10 - IBT report submitted for presentation at the May 10-11, 1974 meeting of the New York Academy of Sciences, and read by Dr. T. R. Torkelson, Chairman of MCA's Technical Task Group on Vinyl Chloride Research.

Item 11 - IBT's "Seven Month Status Summary Report", dated June 19, 1974.

Item 12 - Letter of June 18, 1974 from Ken Schadeberg to MCA, reporting termination of exposure to mice in accordance with oral instructions of MCA.

Item 13 - IBT's tables summarizing mortality and body weight data for the first nine months of exposure of the chronic inhalation study with vinyl chloride. These tables were submitted with Item 12.

Also enclosed are two additional items relating to the epidemiological study on vinyl chloride workers conducted for MCA by Tabershaw/Cooper Associates, Inc.

Item 14 - TCA's final report on the epidemiological study, dated May 3, 1974.

Item 15 - Retabulation of certain data from the Tabershaw/Cooper report, performed at the request of Dr. Warren R. Muir,

of the President's Council on Environmental Quality, and submitted for inclusion in the record at his request.

We are pleased to provide these documents for whatever information and guidance they can help provide the OSHA as it strives to formulate permanent standards for vinyl chloride. We trust that the materials are responsive to your requests. Please let us know if we can be of further assistance.

Sincerely,



W. J. Driver

Enclosures

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