

REPORT TO THE BOARD OF DIRECTORS
MANUFACTURING CHEMISTS ASSOCIATION

E. E. CHRISTOFANO, CHAIRMAN
OCCUPATIONAL HEALTH COMMITTEE

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Since my last report to the Board in February 1976, representatives of the Occupational Health Committee testified on behalf of MCA before the Subcommittee on Manpower and Housing of the House of Representatives Committee on Government Operations at an oversight hearing on the Occupational Safety and Health Administration (OSHA), before the National Academy of Sciences Committee on Public Information in the Prevention of Occupational Cancer and met with Dr. Morton Corn, the Assistant Secretary of Labor. An underlying theme of all three appearances was that regulation of each and every chemical in the work environment under separate rules is unworkable. Instead it was urged that entire sectors of the chemical industry be covered by simple guidelines enforced by inspectors experienced in that special industry. Industries, such as papermaking, pesticide manufacture, printing ink and petroleum refining were mentioned as examples where such regulation would be appropriate.

Recently the National Institute for Occupational Safety and Health (NIOSH) and OSHA have begun to prepare industry-wide guidelines on pesticide manufacture and printing ink formulation. Furthermore, at a recent NIOSH Workshop on Regulation of Pesticides in the Workplace, Mr. Steven Wodka, Legislative Assistant for The Oil Chemical and Atomic Workers suggested an approach to worker health protection similar to the views expressed previously at the hearing and meetings just mentioned.

Encouraged by the acceptance being gained for the idea of preparing regulations on an industry-by-industry basis, the Committee intends to further pursue its attempts at simplifying rules by working with the agencies involved.

The issue of identification of all chemicals including trade name products entering the workplace surfaced at the Congressional Oversight Hearing mentioned earlier. At that time the widespread practices among chemical manufacturers were disclosed whereby products are identified only by trade name with inadequate instructions for safe handling on the

label. We predict that complete disclosure of the composition of trade name products will become a major effort by OSHA in the next year or two.

Recently the Committee sponsored the preparation of an article by Dr. W. R. Gaffey, a leading epidemiologist, which provides guidance in how to collect health and employment data, including exposure information, that will be meaningful and adequate for future epidemiological studies. To extend such studies across the entire petrochemical industry, we hope to begin a joint mortality study soon with the American Petroleum Institute.

At this time the Committee is beginning a feasibility study (in conjunction with the American Petroleum Institute) on the gathering and examination of mortality statistics among petrochemical workers. Since the Committee believes that worker health experience will remain topical over the next several years, it is also investigating a tumor registry among MCA member companies to be maintained by a contractor. It is expected that budget requests for these two activities will be firm by January 1977.