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Occupational and Environmental Medicine

AN 7052 SEP 21 1992
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September 18, 1992

Robert Hinderer, PhD.
Director, Health, Toxicology and
Product Safety
BF Goodrich: Geon Vinyl Division
6100 Oak Tree Blvd.
Cleveland, OH 44131

Re: Vinyl Chloride Medical Programs

Dear Dr. Hinderer,

Last month we met and discussed several issues pertaining to the Geon Vinyl Division's medical programs for employees with exposure to vinyl chloride monomer. Over the past 15 years there has been a substantial reduction in the degree of employee exposure to VC monomer. Despite this reduction, the medical surveillance requirements of the OSHA Standard remain unchanged. These include:

- Annual history, physical, and liver testing for all exposed employees, without regard to the use of protective equipment.
- Biannual examinations for employees employed in vinyl chloride manufacture for ten years or longer.
- Repeat of abnormal liver tests within 3 or 4 weeks with consideration of withdrawal of the employee from exposure for more extensive evaluation.

While this approach was appropriate for employees with high levels of exposure to vinyl chloride in the past, its relevance for employees who have never had unprotected exposure is uncertain. As we discussed, we do not have a clear understanding of how each facility is applying the standard to its current work force and to retirees.

At the same time, we have accumulated a substantial data base of employee medical examinations in the Medical Surveillance System. While periodic morbidity and mortality evaluations have been conducted over the years, the liver test results of vinyl chloride-exposed employees have never been specifically analyzed.

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Project Outline

The following is a proposal to conduct an occupational health evaluation of the Geon Vinyl Division's medical surveillance programs for employees with current and past exposure to VC monomer. The purpose of this evaluation is to:

- Insure that facility medical programs are in compliance with the OSHA requirements for medical surveillance, including examinations and follow-up.
- Evaluate the effectiveness of current programs in managing employees with different exposure histories and health risks.
- Assess VC morbidity and mortality experience at Geon facilities, through individual case evaluation.
- Develop an updated Medical Surveillance Program for Vinyl Chloride Exposure, including a more practical and cost-effective approach for employees at low risk for developing VC-related disease.
- Determine the feasibility of conducting more in-depth analysis of medical examination results from the Medical Surveillance System.

Approach

This project will consist of the following activities:

- I. Review of medical literature pertaining to morbidity, mortality and medical surveillance of VC-exposed workers.
- II. Review research activities pertaining to VC exposure using BFG surveillance data at the University of Louisville.
- III. On-site program and case review at three representative Geon facilities.
- IV. Review of data stored in Medical Surveillance System related to VC medical surveillance.
- V. Preparation of an updated Medical Surveillance Program Guideline for VC-exposed employees at Geon facilities.
- VI. Preparation of a presentation on the feasibility of performing further analysis of Medical Surveillance Data.

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Based on my familiarity with your facilities and their programs, I recommend that we include the Avon Lake and Louisville plants in this project. In addition to being the site of the initial vinyl chloride cases, the Louisville plant has been involved with university-based research on the effects of VC on the liver. Certainly, we will want to consider their activities and findings prior to conducting any analysis of our own data. In order to have a more complete assessment, I recommend that we include a third facility, such as Pedricktown or Henry.

Level of Effort

I estimate that this project will require the following level of professional effort:

Task I:	0.5 days
Task II:	1.0 days
Task III:	3.0 days
Task IV:	0.5 days
Task V:	0.5 days
Task VI:	<u>0.5 days</u>
Total	6.0 days

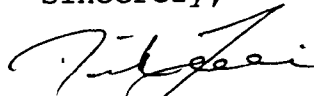
I estimate that this project can be completed in two months.

Budget

I will personally conduct this project as outlined for a fixed fee of \$7,000.00. This will include all travel expenses and costs of computer literature searches and article retrieval. I request an initial payment of \$5,000.00 at project initiation. The remaining \$2,000.00 will be billed upon completion of the Medical Guideline and presentation of the feasibility assessment.

I appreciate your consideration in reviewing this project. I look forward to working with your Division on these and other projects in a continuing effort to protect and preserve employee health. If you have any questions, or would like to modify the scope or approach I have outlined, please contact me.

Sincerely,



Richard Lewis, MD, MPH

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