

Memorandum

AIR
PRODUCTS 1/2

To: F. J. Ryan Dept Chemicals Administration
From: A. J. Diglio Dept /Ext Corporate Environmental/8339
Date 22 January 1988
Subject: AIHC Planning

bcc: M. R. Chmura H. J. Smith
J. T. Christy L. B. Tepper
B. Z. Drozdowicz P. J. Usinowicz

Frank:

This is in reply to your request concerning the AIHC Planning Session addressing Air Products' position on the American Industrial Health Council (AIHC).

I have addressed the questions that would be posed at the Planning Session. These are:

- What is Air Products' impression of AIHC?
- What does Air Products see as AIHC's most beneficial role to serve Air Products and its member companies?

I have discussed these issues with Marty Chmura, Jim Christy, Bronek Drozdowicz, Joe Smith, Lloyd Tepper, and Paul Usinowicz. Paul and Bronek serve on AIHC Committees.

As you know, the mission of the American Industrial Health Council is to "advocate and promote the implementation of the most advanced, sound scientific methods as a basis for the review, risk assessment, regulation, where regulation is warranted, of the substances which may pose significant chronic health risks to people without acting as an advocate for any specific substances." Our consensus is that Air Products' membership and contributions to AIHC are beneficial to our business. AIHC should continue to pursue its mission.

These are typical comments:

- AIHC is the only trade association that has any credibility on scientific health issues with the regulatory agencies such as NIOSH, EPA and FDA. Its expertise is well recognized in risk assessments. It has excellent contacts in the agencies, academia and member companies. It is on the leading edge of testing in toxic matters. It has convinced EPA to change its position on the use of automatic triggers for carcinogenicity testing under the Toxic Substance Control Act (TSCA). AIHC's weight-of-the-evidence risk assessment position is widely accepted in the upper echelons of the agencies.
- AIHC is very credible and effective in scientist to scientist communications in government and the public. The scientific personnel participating at the AIHC meetings and task forces are highly respected.

AP00024710

TO: F. J. Ryan
FROM: A. J. Diglio

Page 2
22 January 1988

- Air Products' personnel value these contacts and the information provided by AIHC. Our participation has saved us considerable resources in dealing with industry-wide issues that we face in our business.
- Air Products does not have a toxicology lab or the personnel resources as do some of the large organizations that participate in AIHC. However, we do have access to their ideas, information and personnel through the AIHC. AIHC is on the right track and they are working on the large chronic health issues. They have advanced the cause of good science in a credible non-political manner. AIHC is a good idea and holds the regulators accountable to good science. While we don't often see the direct benefits on day-to-day activities in the plants, we support our resource and sweat equity commitments to AIHC.

In summation, our consensus is that we should continue to participate in the AIHC, and that it is the only organization of its nature. The demand on its services and value to Air Products will continue to grow because of the national sensitivities to the toxic effects of chemicals in the environment.

On the second question, What would Air Products like to see AIHC do? (assuming resources were unlimited). The responses were as follows:

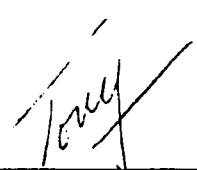
- While AIHC is very credible on a scientists to scientist basis, it is not a very effective Congressional lobbying organization. It is suggested that AIHC consider expanding the education of key congressional staff personnel on health related legislative issues. Educating the staffers who are not technically oriented on good science in risk assessment and cost benefit analysis can lead to a more rational approach to legislation. The work AIHC has done with those staffers has been credible, but we would like to see this effort expanded.
- The scientific health issues have been politicized. However, the lack of scientific impact is more evident in the non-scientific academic, public and government sectors. AIHC should consider expanding its efforts to communicate with not only scientific groups, but also to educate the non-scientific elements of society.
- AIHC should be involved in SARA Title III "toxics" risk evaluation and communication to the public and in Proposition 65 type toxic initiatives.
- AIHC publishes very well in the science and trade journals and communicates well within the industry but not in the general press. Scientific information that the layman can understand should be prepared and published to reach the public on health issues. Perhaps Letters to the Editor should be sent explaining risk assessments and chronic health issues to the public so that they better understand the health effects associated with chemicals on a logical rather than an emotional basis.

AP00024711

TO: F. J. Ryan
FROM: A. J. Diglio

Page 3
22 January 1988

- Issues on reproductive effects of chemicals is rapidly becoming a serious problem to the industry. While AIHC is working on the subject, the public is very emotional on this issue, particularly at our St. Gabriel, Calvert City, and California locations. Proposition 65 type legislation is a zero risk example of the public's perception of health effects from chemical exposure. AIHC should increase its efforts in education on reproductive toxicology, neurotoxicity, carcinogenicity and biomonitoring.
- AIHC is working on improving risk assessment models. However, there is concern that the biological validity of most of the models are in question as predictive of human health effects of chemicals. AIHC should promote other more biologically valid risk assessments.
- While AIHC coordinates with CMA and CIIT, it is suggested that the trade associations such as BRT, NAM, and the U.S. Chamber be provided with AIHC information. AIHC should consider those organizations' broad communication network to educate a larger audience on key issues.
- AIHC should continue to broaden its educational campaign and outreach on issues of risk/benefit associated with chemicals to schools, universities, communities.
- AIHC should consider dialogue and projects with the more reasonable environmental groups on chronic health effects.
- AIHC should structure and promote a conceptual framework for research programs to be conducted by CIIT, government, industry and academia leading to the goal of short-term predictive tests to replace "automatic" carcinogenicity tests.



A. J. Diglio

AJD/pbr
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Anthony J. Diglio
Director
Corporate Environmental Activities
(215) 481-8339



28 January 1988

F. J. Ryan

Frank:

Please find attached a letter for your signature concerning Air Products' position on AIHC that you requested.

Please let me know if you need anything else.

A handwritten signature in dark ink, appearing to read "A. J. Diglio", written over a horizontal line.

A. J. Diglio

AJD/pbr

Attachments: 1) Letter to Dr. Bruce W. Karrh,
27 January 1988
2) Amended background memo

AP00024713