Firestone
NEWS SERVICE

THE FIRESTONE TIRE & RUBBER COMPANY

Statement by
Firestone Plastics Company
on the
National Institute of Occupational Safety and Health
Report on
Genetic Risks of Vinyl Chloride

A recently issued report on GENETIC RISKS OF VINYL CHLORIDE was based on part of an overall health survey at the Firestone Plastics Company's Pottstown, Pa., facility in October, 1974.

The survey was conducted by Federal health officials in cooperation with Firestone in connection with studies instituted after vinyl chloride monomer (VCM) was identified as a possible cause of angiosarcoma, a form of liver cancer believed related to massive exposure to VCM over an extended period of time.

The report was made public late in January by the National Institute for Occupational Safety and Health and has been submitted for publication to Lancet, a medical journal in England.

Firestone received a copy of the report early in February from Dr. Peter F. Infante, a NIOSH epidemiologist.

The 1974 survey was conducted by NIOSH at Firestone's plant in Pottstown because operations there include both tire manufacturing and polyvinyl chloride (PVC) production, enabling researchers to study employees with exposure to vinyl chloride monomer (VCM) and

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those without such exposure for purposes of data control.

The Firestone facility was selected for the survey because the combination of workers exposed to VCM and not exposed to VCM in one location was unique in the industry.

The data in the report appear to indicate that statistically wives of workers exposed to VCM are more likely to suffer miscarriages and stillbirths than those who are not.

The information was obtained from interviews with 253 workers at the Firestone plant, but no interviews were conducted with workers' wives and no data were obtained concerning maternal ages except indirectly through paternal age.

This report certainly indicates the need for further research and study even though it would be premature to draw firm conclusions about the precise role of VCM exposure as a cause of miscarriages or stillbirths.

Firestone remains greatly concerned about the possibility of genetic and other health risks that may be associated with exposure to VCM. We will continue to cooperate with industry, union, government and public health groups in studying this matter and in taking steps to reduce exposure levels as we have been doing since the possible health risks of exposure to VCM first became known.

This NIOSH report was based on a survey of workers whose exposure to VCM in prior years was many times greater than the exposure level of one part per million parts of air that is the

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Federal standard going into effect April 1. Exposure in the area surrounding the plant as the result of emission to the atmosphere would be a minute fraction of that level.

Whatever risk to health existed as the result of exposure to VCM in the past should be substantially lessened or potentially eliminated by the drastically reduced exposure levels that will be required in the industry from now on.

end

DRAFT

1) Dr. Jeppa
2) Ray Schmidt
3) JT Baun
4) ARA

This is start of SPI comments

From A. Beveridge 12:30 2/10/76
BVC / EPA

Health Subcommittee Comments on Proposed Vinyl Chloride Standard

INTRODUCTION

These comments have been prepared by the Health Committee of the Vinyl Chloride and Polyvinyl Chloride Producers Group of SPI. The Committee has analyzed The Scientific an Technical Assessment Report on Vinyl Chloride and Polyvinyl Chloride (STAR Document), and The Quantitative Risk Assessment Community Exposure to Vinyl Chloride (Risk Assessment Document) and the Administrator's explanation preceding the proposed Vinyl Chloride Standard published in 40 Fed. Reg. 59523 et. seq. Our comments are divided into four parts: (1) an introduction and general critique of the documents as they pertain to public health matters; (2) a detailed discussion of certain specific objections; (3) recommendations as to future course of action; and (4) an appendix listing by page and line certain errors the Committee has noticed in the documents.

At the outset, we believe that the Environmental Protection Agency has set a high standard in the documents it has issued accompanying the proposed Standard. The STAR Document brings together in one place much of the information known about vinyl chloride and its health effects. The Risk Assessment Document is a useful analysis, and we applaud ---

the process which the Agency went through to produce it and hope that it will be used in the future. Our criticism is not with the process, which we endorse, but with some of the data, facts and interpretations drawn by the Agency.

Our principal criticism of the Risk Assessment Document is that at times it appears to be written to justify a conclusion already reached by the Agency rather than to set forth the scientific framework for the decision and the options open to the Administrator.

We believe a Risk Assessment Document should have two important purposes. First, it should assist the Administrator to reach a decision about the wisest course to pursue in regulating chemicals such as vinyl chloride by identifying and attempting to quantify the various risks posed by the chemical and by discussing possible policy options. Second, it should encourage public understanding of the difficult decision that is inevitable when the Agency regulates a substance about which hard facts are unavailable and extrapolation from existing data can be made only with limited reliability.

As will be set forth in greater detail we believe that the discussion of the "no threshold" assumption and the use of a "Log-Probit" model could have been more complete and objective. In all likelihood, such difficulties could have been solved if the Risk Assessment Document had been circulated in draft form before it was finally published. The Agency did so with most of the documents which were issued to a company the Standard and in general, we understood. ~~that~~

comments it received from interested parties were constructive. If this process had been followed, we believe that the Risk Assessment Document would have presented a fairer and more complete discussion of the scientific background against which the Administrator's decision was made and would therefore have been of greater assistance to him and to the public in understanding his decision.

We also believe that some attempt should have been made to update the STAR Document when it was reissued in December. The information in that report was gathered almost twelve months prior to its final publication and in the intervening time certain additional information about the health effects of vinyl chloride had been gathered. We recognize that it is almost impossible to ensure that any scientific publication is absolutely current when it is in the published form of a STAR Document. However, in such cases, an errata or addendum could be issued at the time of its final publication and we urge the Agency to adopt such a procedure.

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