

BIO-MEDICAL RESEARCH
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DOW CHEMICAL U.S.A.

LIT FILE?

MIDLAND, MICHIGAN 48640

October 29, 1980

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Fred Hoerger
2030 Dow Center

I saw this manuscript by Charles R. Perry some time ago. It is cleverly written for business/management type people.

1. I have no comment on his estimated costs; I don't understand them.
2. I don't know where he got his figures on angiosarcoma deaths. The last confirmed death in the U. S. was not in 1976 but as shown in Table 8 compiled by Dr. John Stafford of ICI in England, there were 4 deaths in 1976, 2 in 1977, 2 in 1978 and apparently none in 1979. Although not yet in John's table at least one death has occurred in the U. S. in 1980. These numbers are too small to determine any trends. All that can be said is that as of now, the predicted deluge of deaths have fortunately not occurred. Europe, particularly Great Britain has had several bad years since 1976. I don't know the total but Great Britain had more than one death already in 1980. Why the apparent increase, is not clear.
3. I wish Dr. Perry had indicated in his reports that the cost of additional regulations, engineering, etc. will be disproportionately high as increasingly restrict standards are set. If no lives are saved but additional money is spent, the cost per life saved is infinity ($X \text{ dollars} / 0 = \infty$)

Sincerely,

T. R. Torkelson
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ebg

Enclosures (Tables 5 & 8 from Dr. John Staffords
Compilation of 1 May 1980).



R&S 113082

SAFE AND HEALTHFUL WORKING CONDITIONS:
THE CASE OF VINYL CHLORIDE

DATE: 4/15/80

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The Occupational Safety and Health Act was passed less than ten years ago with an apparent ease and unanimity uncharacteristic of major labor legislation in this country. The Occupational Safety and Health Administration created by the Act, however, has not enjoyed the blessings of its noble birthright. Indeed, OSHA, almost from its inception, has been the target of public criticism and private conspiracy typically reserved for the mad or illegitimate progeny of royalty.

The fall from grace of the highborn is fascinating to observe and intriguing to explain. The "downfall" of OSHA began with the requirement of "inflation impact statements" for major regulatory actions and has been carried on in the "regulatory reform" and "regulatory analysis" movements. These movements are the product of a perception that OSHA, like an unwise monarch, is imposing substantial and oppressive new taxes to support personal adventures which provide or promise little tangible benefit to an already overtaxed populace which, per force, must indulge the king's whims.

There can be no doubt that OSHA regulations impose a tax on the producers and consumers of American-made goods and services. There is, however, considerable latitude for debate over the magnitude of that tax both in absolute terms and in relation to the benefits purchased by the tax. This debate over the absolute and relative impact of OSHA regulation on productivity and cost may never be subject to definitive resolution, but it should be possible to gain some perspective on the issue by analysis of the results of specific