



**Shell Oil Company**  
Interoffice Memorandum

OCTOBER 15, 1980

FROM: R. W. FORTENBACH

TO: J. G. SIMPSON  
J. D. RANDELL  
J. D. HARRIS  
V. L. KIRKLAND  
M. G. SIEGEL  
K. C. CRAWFORD  
R. R. ERICKSON  
R. E. JOYNER ✓

SUBJECT: OSHA CANDIDATE CARCINOGEN LIST

This is to summarize the actions agreed to in our meeting October 9, regarding VCM and EDC. The purpose of the meeting was to set the wheels in motion leading toward two separate written responses to OSHA (prior to November 10, 1980).

In the case of EDC, the agreed to strategy or approach in our written response to OSHA will be to request removal of EDC from the candidate carcinogen list on the basis that the available toxicology data (oral) does not support classifying EDC as an animal carcinogen. Gavage studies are not appropriate means of exposure to simulate possible effects in man in a normal workplace environment. Our response might also briefly mention that our plants are in compliance with the current standard and something about the relatively high exposures of the past as evidenced by acute symptoms in workers such as nausea.

Action Items:

1. V. L. Kirkland to prepare toxicology statement on or before October 20, suitable for transmittal to OSHA as an attachment to a covering letter to be drafted by R. H. Coe.
2. R. W. Fortenbach to have Information Services provide any epidemiology studies on EDC to C. E. Ross. Materials hand delivered to C. E. Ross October 13.
3. R. W. Fortenbach to contact SPI to determine if EDC Safety Group is still active. Handled - they still meet periodically but do not plan to respond to OSHA.

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CORPORATE MEDICAL  
DIRECTOR

→ 01-VCM-PVC-OSH  
01-EDC-OSH  
CER - see p. 2  
Hed is work I have  
done to date  
The VCM brain tumor  
data is inconclusive  
& ends in 1972  
Prob. of no use.  
P/s. see if you  
can help them  
out.

- ✓ 4. C. E. Ross to review EDC epidemiology studies with a view toward submitting any negative results and, if possible, preparing a graph depicting a falloff in yearly incidence of X in humans. Comments, which are due R. H. Coe by October 20, should be in a form suitable for transmittal to OSHA as an attachment to a covering letter to be drafted by R. H. Coe.

The agreed to strategy for our written response to OSHA on VCM will be to make a short statement to the effect that we, and the vast majority industry to our knowledge, are in compliance with the current VCM regulations and that the current situation is an excellent example of responsible regulation on the part of both industry and the regulatory agencies involved. To support our contention that the current regulations are completely adequate, we will point out the decrease in yearly incidence of angiosarcoma basis Worldwide Registry Statistics and that the projected epidemic-like incidence of cancer of the liver in human has not occurred primarily due to the fact that observed angiosarcoma in humans today is the result of the unfortunate massive exposures of the past. We will also make a comment to the effect that there is not any valid statistical correlation between VCM exposure and brain tumors in humans basis the CDC report on VCM (the CMA VCM epidemiology study suggests brain tumor correlation). The overall tone of the letter should be that the agencies have done a good job of regulating VCM and there is not any need or justification for more onerous regulation.

Action Items:

- ✓ 1. C. E. Ross to prepare yearly incidence of angiosarcoma graph and summary exhibit of the CDC report on VCM supporting statement that there is not any correlation between VCM exposure and brain tumors. This information is due R. H. Coe in written format on or before October 20.

Following completion of the above action items and R. H. Coe's first draft letter responses to OSHA, we will convene the VCM/EDC meeting participants to review the suggested responses and assign responsibility for obtaining final approvals.

R.W. Fortenbach

R. W. Fortenbach

*This refers to the  
M+M Report  
issued by CDC  
re brain tumors at  
Dow + Carbide*

cc: G. W. Pyatt  
R. J. Reynolds  
P. C. Holladay  
J. J. Bonin  
C. D. Kary  
C. E. Ross  
D. K. Spencer  
R. H. Coe  
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