

ALLIED CHEMICAL CORPORATION

MEMORANDUM

P. N. S.

MAY 7 1974

RECEIVED BY

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May 7, 1974

J. M. QUINN

To: Mr. P. N. Shellenberger
Mr. R. J. O'Leary

Subject: Additional Epidemiological Studies on Workers
Exposed to Vinyl Chloride

Attached is a copy of my memorandum of May 2nd
on the above subject.

We have now received the ORC call for financial
support and, based on telephone clearance, I have agreed to
commit Allied's funds to this project, as well as to the
studies initiated by MCA. (Copies attached.)

W. S. Ferguson
W. S. Ferguson

WSF:mn
Attach.

cc: Mr. W. L. Sullivan

ENVIRONMENTAL SERVICES

	INFO	ACTION
JHQ		
JMD		
WFS		
CK		
LMF		
WCK		
CITY		
SK		
BJN		
LLS		
F	WORKS	
I	PRODUCT	
L	TOXIC	
E	EST. TO	

ASI 00023624



Organization for
Counselors, Inc.

1660 L Street, N.W.
Suite 212

Washington, D. C.
(202) 872-1000

Cable Address: ORCSDON

Memorandum

May 3, 1974

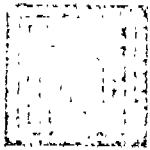
TO: ORC OCCUPATIONAL SAFETY AND HEALTH STANDARDS GROUP

FROM: Bill Nichols, Leo Teplov, Wayne Brooks

Bill

Since a couple of errors were found in the May 1 letter to the Group concerning the polyvinyl study, we enclose a fresh draft and ask that you substitute this May 3rd letter for the one dated May 1. There was no error in the protocol which was attached to the May 1 letter.

ASI 00023625



Organization Resources
Consultants, Inc.

1660 L Street, N.W.
Suite 212
Washington, D. C.
(202) 872-1010

Cable Address: ORCONS

Memorandum

May 3, 1974

To: ORC Occupational Safety and Health Standards Group

From: Bill Nichols, Wayne T. Brooks, Leo Teplow

Bill

Since the polyvinyl crisis surfaced in January, the ORC OS&HS Group formed a PVC Task Force which has been meeting at frequent intervals, both before and after the promulgation of the emergency standard.

The PVC Task Force concluded that, in light of the pressure to (1) reduce the present 50ppm limit in the emergency standard and (2) adopt in the permanent standard the NIOSH recommendations to bring the vinyl chloride standard down to 1ppm, it is essential to bring additional data to the attention of OSHA and NIOSH, in the hope of providing a basis for setting the revised or permanent standard at a level which will still make it possible for the industry to continue to operate.

There can be only two kinds of additional data made available (1) animal experimentation; and (2) human experience.

Animal experimentation is being undertaken by MCA, but will not be available for at least 7 - 9 months.

Human experience requires that a rapid mortality study be undertaken. NIOSH is making a fast sample mortality study of vinyl producers and polyvinyl compound producers covering seven major plants.

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May 3, 1974
Group

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ORC has been asked to initiate and manage a mortality study in the PVC fabricating industry (extrusion, molding, calendering, etc. of PVC) in which employees have been exposed to relatively low concentrations of vinyl chloride monomer -- but substantially above one part per million.

Dr. Leonard Chiazze, Director, Division of Biostatistics and Epidemiology Georgetown University School of Medicine, has been retained as ORC consultant for this project. The protocol he has prepared for the mortality study, entitled "Mortality Among Workers Involved in Processing PVC" is attached. Briefly, the protocol calls for (1) identification of the companies; (2) company authorization to its group life insurance carriers to make death certificates for its PVC processing plants available to ORC; (3) classification of these certificates by a nosologist; (4) selection of all certificates giving cancer or liver conditions as cause of death, and follow-up at hospitals named in the certificates to clarify specific conditions; (5) inquiry of hospital pathologists as to any known cases of angiosarcoma; (6) any cases of angiosarcoma that may be uncovered to be followed up to obtain occupational histories; (7) cancer or liver deaths to be analyzed to develop proportionate mortality ratios, to be compared with those in the U.S. population.

Since it would be impossible to complete the entire project in 120 days (maximum time probably available), Phase One of the study would cover a limited but substantial proportion of the PVC fabricating industry.

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Since it would be impossible to complete the entire project in 120 days (maximum time probably available), Phase One of the study would cover a limited but substantial proportion of the PVC fabricating industry.

Since it is impossible to make a firm estimate of the cost of such a study, it is proposed that a cost of \$200,000 be assumed for Phase One.

If it is assumed that thirteen to fifteen of the major producers and users of PVC will support the study, a cost of about \$14,000 per company may be estimated as an initial commitment per company.

One Company has already sent ORC its check for \$14,000, in order to get the study started.

Each company that is involved as a substantial producer or user of PVC is requested to advise ORC:

*Response
Needed* →

1. Whether it is prepared to help finance the study;

2. Regardless of its decision as to point one, identify to ORC major PVC users, either as a list of its substantial customers or, if it wishes, a list of major users known to it (which list includes its customers) - preferably by plant identification. This list should include your own fabricating plants;
NA
3. Send to ORC any measurements it may have made in any PVC processing or fabricating plants (either its own or customer plants), giving levels of vinyl chloride monomer, nature of operation, location, and method of measurement;
NA
4. Contact the insurance company that contracts your group life insurance to alert them about the study and to authorize their release of death certificates.
NA

If any data is to be made available in time to be for consideration before setting a final standard, time is of the essence, and company decisions need to be made with great expedition, and ORC should be promptly advised by telephone as to point 1, and by letter as to points 2 and 3 above.

In the meantime we shall proceed to line up the people with rare skills that will be essential to get this study initiated and carried out.

We would also appreciate your suggestions as to an outstanding toxicologist who might be used as a consultant for the study and to evaluate the results in any hearings that may be held."

ASI 00023629