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October 21, 1974

Dr. Joseph K. Wagoner
Director, Division of Field Studies
and Clinical Investigations
Dept. of Health, Education & Welfare
Public Health Service
National Institute for Occupational
Safety & Health
U. S. Post Office & Courthouse
Cincinnati, Ohio 45202

Dear Dr. Wagoner:

Monsanto will be happy to attend a meeting similar to the one you proposed in your letter of October 15 concerning whether any of our workers would constitute a suitable occupational group for the study of the effects of PCB on humans.

We have a slight logistic problem. I leave St. Louis on October 26 for a tour of our far eastern plants and will return the early part of the week of November 17. Dr. Roush, our Associate Medical Director will be here but I don't think he is as familiar with the PCB situation as I am. If you want a meeting before then, I would suggest you contact Dr. Oliver DeGarmo, of our Monsanto Industrial Chemicals Company at this same address. Dr. DeGarmo is in charge of environmental matters for the MICC group.

Mr. Elmer Wheeler, of our own department, who is in charge of our environmental health services, is also familiar with the PCB matter. Neither of these are medical individuals and it may be that you will want to wait until I return. Please let me know before the 25th if I can be of any help.

Sincerely,

R. Emmet Kelly, M. D.
Medical Director

REK/ln
cc: Dr. Oliver DeGarmo
Mr. Elmer P. Wheeler
Mr. Gerry Bratsch

DSW 329919

OCT 17 1974

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
PUBLIC HEALTH SERVICE
CENTER FOR DISEASE CONTROL

NATIONAL INSTITUTE FOR OCCUPATIONAL
SAFETY AND HEALTH
U.S. POST OFFICE AND COURTHOUSE
CINCINNATI, OHIO 45202

Room 523

October 15, 1974

Emmett Kelly, M.D.
Medical Director
Monsanto Chemical Corp.
800 N. Lindberg
St. Louis, Missouri 63166

Dear Dr. Kelly:

As you are aware, the Occupational Safety and Health Act gives the National Institute for Occupational Safety and Health (NIOSH) legislated authority and responsibility for the conduct of industry-wide studies of the effect of long-term, low-level exposure to industrial materials, processes, and stresses on the potential for illness, disease or loss of functional capacity in occupationally exposed adults. This epidemiological research is aimed at defining the relationship of disease incidence to possible causative factors in the work environment. The primary responsibility for conducting such research in NIOSH belongs to the Division of Field Studies and Clinical Investigations (DFSCI).

A tremendous quantity of research has demonstrated that environmental exposure to polychlorinated-biphenyls (PCB's) causes serious impairment of the functions of the liver. This impairment subsequently affects a variety of enzyme systems as is indicated in several articles in the literature. A recent article by Nobuyuki, Nagoeki, et al. entitled "Histopathologic Studies on Liver Tumorigenisis Induced in Mice by Technical Polychlorinated Biphenyls and Its Promoting Effect on Liver Tumors Induced by Benzone Hexochloride" suggests PCB's are carcinogenic in animals. However, results that evaluate long-term health effects in humans from either acute or chronic exposure to PCB's are not available.

DSW 329920

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For the purpose of assessing the potential for chronic effects, DFSCI is attempting to identify a suitable occupational group for study. To this end, I would like to arrange a meeting with representatives of Monsanto Chemical and NIOSH to discuss the inclusion of PCB-exposed active and inactive workers at Monsanto in a planned retrospective cohort study. The possibility of including other manufacturers and users of PCB's in this study is being considered.

I may be contacted by writing to the address above or calling 513-684-3255. Your cooperation in this matter is appreciated.

Sincerely yours,

Joseph K. Wagoner by JAL

Joseph K. Wagoner, S.D. Hyg.
Director, Division of Field Studies and Clinical Investigations

Encl:
OSH Act of 1970

DSW 329921