

C-01522

December 15, 1976

Mr. Edward J. Baier, Deputy Director
Department of Health, Education and Welfare
National Institute for Occupational
Safety and Health
5600 Fishers Lane
Rockville, Maryland 20852

Dear Ed:

I thank you for sending a copy of the report by the NIOSH Division of Surveillance, Hazard Evaluations, and Field Studies of a review of our DCMA Epidemiology Study of workers in lead chromate pigments plants.

Some of the statements in the critical review seem to reflect adversely not only on the technical aspects of the work but also on the ability of the authors to deal fairly with the subject matter. For this reason, I asked that Equitable Environmental Health study your criticism and furnish us with a response. I also requested and have obtained independent reviews of the criticism from Dr. Sidney Pell, the Du Pont Biostatistician, and from Dr. Joan Davies of the Chester Beatty Research Institute, Institute of Cancer Research, Royal Cancer Hospital in London, England.

The net result of the responses I have received are that the NIOSH reviewer has made several errors of fact and several errors of interpretation or judgment. The response that was prepared by Dr. W. Clark Cooper of Equitable Environmental Health Inc. covers nearly all of the points that were made by the several reviewers and, in addition, furnishes some added facts which might be useful to your Division of Surveillance, Hazard Evaluations, and Field Studies. For this reason, I attach Dr. Cooper's comments in their entirety. Dr. Pell's comments are also attached. A marked copy of Ms Robinson's critique carries the principal comments submitted by Dr. Davies.

In the last paragraph on page 3 of his letter, Dr. Cooper has indulged in an expression of his opinion of what the future may disclose. That is his privilege. He urges continued follow-up of this and similar populations. This advice has been accepted. His recommendation for individualized study of gastrointestinal tract cancers is being actively carried out right now.

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We are all agreed, Ed, that the NIOSH comment about a dearth of subjects in the study is regrettable but true. I think that you can appreciate the origin of this study and, understanding it, accept some of its inevitable shortcomings. The pigment manufacturing industry was faced with suggestions that the lead chromate pigments which they had been manufacturing and selling for years had a relationship to the occurrence of human lung cancer. The initial step in trying to determine the validity of the suggested link was obviously to study the mortality records of workers who had been exposed during past decades.

The services of a most competent firm were engaged, and full cooperation was extended in furnishing records on which a study could be based. In this case, as in many others, the records of employment, exposure, health, and death in past decades were not nearly as complete as would now be desired. The investigating firm, Equitable Environmental Health, had to make the most of what is available. We think a thorough and competent job was done. The DCMA acted with a sense of responsibility and with speed in informing NIOSH of the inception, progress, and results of the study.

Kindest regards.

Sincerely,

James F. Morgan

JFM/iml

Attachments

Additional Copies to: Dr. Morton Corn
Assistant Secretary of Labor
USDOL/OSHA
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Mr. Gerald L. Weinstein
Directorate of Health Standards Development
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