

Memorandum**AIR
PRODUCTS**

To: **F. J. Ryan** Dept **Chemicals Administration**
From: **A. J. Diglio** Dept ,Ext **Corporate Environmental/8339**
Date: **22 January 1988**
Subject: **AIHC Planning**

Frank:

This is in reply to your request concerning the AIHC Planning Session addressing Air Products' position on the American Industrial Health Council (AIHC).

I have addressed the questions that would be posed at the Planning Session. These are:

- What is Air Products' impression of AIHC?
- What does Air Products see as AIHC's most beneficial role to serve Air Products and its member companies?

I have discussed these issues with Marty Chmura, Jim Christy, Bronek Drozdowicz, Joe Smith, Lloyd Tepper, and Paul Usinowicz. Paul and Bronek serve on the AIHC Committee.

As you know, the mission of the American Industrial Health Council is to "advocate and promote the implementation of the most advanced, sound scientific methods as a basis for the review, risk assessment, regulation, where regulation is warranted, of the substances which may pose significant chronic health risks to people without acting as an advocate for any specific substances." The consensus of our group is that Air Products' membership and contributions to AIHC are beneficial to our business, and that AIHC should continue to pursue its mission.

These are the typical comments from the group:

- AIHC is the only trade association that has any credibility in scientific health issues with the regulatory agencies such as NIOSH, EPA and FDA. Its expertise is well recognized in risk assessments. It has excellent contacts on the agencies, academia and the companies. It is on the leading edge of testing in toxic matters and it has convinced EPA to change its position in the Toxic Substance Control Act (TSCA) carcinogenicity tests, its weight-of-the-evidence risk assessment position is widely accepted in the upper echelon of the agency.
- AIHC is very credible and effective scientist to scientist in government and the public. The scientific personnel at the AIHC meetings and task forces are highly respected.

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- Air Products' personnel value these contacts and the information provided by AIHC and has saved us considerable resources in these same issues that we face in our business.
- Air Products does not have a toxicology lab or the resources of the large organizations that participate in AIHC. However, we do have access to their ideas, information and personnel through the AIHC. AIHC is on the right track and they are working on the large chronic health issues. They have advanced the cause of good science in a credible non-political manner. AIHC is a good idea and holds the regulators accountable to good science. While we don't see the direct on a day-to-day basis in the plant, we support our resource and sweat equity commitment to AIHC.

In summation, the group's consensus is that we should continue to participate in the AIHC, and that it is the only organization of its nature. The demand on its services and value to Air Products will continue to grow because of the national sensitivities to the toxic effects of chemicals in the environment.

On the second question, What would Air Products like to see AIHC do? (assuming resources were unlimited). The responses were as follows:

- While AIHC is very credible on a scientists to scientist basis, it is not a very effective Congressional lobbying organization. It is suggested that AIHC consider education of key congressional staff personnel on health related legislative issues. Educating the staffers who are not technically oriented on good science in risk assessment and cost benefit analysis. What work AIHC has done with those staffers has been credible, but we would like to see this effort expanded.
- The scientific health issues have been politicized. However, the lack of scientific impact is evident in the non-scientific academic, public and government sectors. AIHC should consider expanding its efforts to not only scientific groups, but also educating the non-scientific.
- AIHC should be involved in Title III "toxics" communication to the public and in Proposition 65 type toxic initiatives.
- AIHC publishes very well in the trade journals and communicates well within the industry but not in the general press. Scientific information that the layman can understand should be published to reach the public on health issues. Letters to the Editor in explaining risk assessments and chronic health issues to the public so that they better understand the health effects associated with chemicals on a logical basis rather than emotional.

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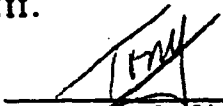
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- Issues on reproductive effects of chemicals is rapidly becoming a serious problem to the industry. While AIHC is working in this area, the public is very emotional on this issue, particularly in our locations in St. Gabriel, Calvert City, and in California. Proposition 65 type legislation is a zero risk example of the public's perception of their risk. AIHC should increase its efforts in education on reproductive toxicology and neurotoxicity.
- AIHC should continue to present a balanced view on health effects issue and continue to focus in the areas that they are working and currently directed. AIHC, however, should help more with the understanding of the language of legislation, regulation and scientific aspects of chronic health issues.
- AIHC is working on improving risk assessment models. However, there is concern that the biological validity of the models are certainly in question as predictive on health effects of chemicals. AIHC should promote other more biologically valid risk assessment means.
- While AIHC coordinates with CMA, CIIT, it is suggested that the trade associations such as BRT, NAM, and the U.S. Chamber be provided with AIHC information. AIHC should consider those organizations' broad communication network to educate a larger audience on key issues.
- AIHC should consider dialogue with the more reasonable environmental groups.
- Dialogue groups on issues of mutual interest with government, environmentalists and perhaps media.
- Educational campaign/outreach on issues of risk/benefit posed by chemicals to schools, universities, communities (comparative risk).
- More emphasis on issue of reproductive risks, neurotoxins, biomonitoring.
- Conceptual framework for developing research programs to be conducted by CIIT, government, industry and academia leading to the development of short-term predictive tests to replace "automatic" carcinogenicity tests.
- Continuous monitoring and discussions with government/academia researchers in areas of toxicology, industrial health, and risk evaluation.
- Involvement in projects dealing with methods for risk evaluation, quantification, comparisons and communications as they relate to Proposition 65 and SARA Title III.

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