

Proposed Statement on the Medical Surveillance Portion  
of the Proposed Vinyl Chloride Standard

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We feel that the proposed standard for medical surveillance of employees exposed to vinyl chloride has three major deficiencies.

1. The proposed standard is directed to the detection of angiosarcoma of the liver or other liver disease rather than to evaluating the general health of the employee. We do not feel that the examination should be directed exclusively toward liver pathology.
2. The proposed standard attempts to define which tests should be done to discover liver angiosarcoma or the pathology which may precede it even though it is generally recognized that none of the proposed tests has yet been demonstrated to be definitive for this purpose.
3. The proposed standard leaves little room for the clinical judgment of the examining physician in evaluating the health status of the employee and recommending the advisability of his working in any given environment.

In the case of other carcinogens for which standards were published by OSHA on January 29, 1974, a more general, and we

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believe better, approach was used. These standards provide for periodic physical examinations but do not attempt to define a specific examination protocol. We note for example that in the case of bladder carcinogens such as beta-Naphthylamine and 4-amino-bi-phenyl where urinary cytology is a clearly indicated test it was not specified in the standard. We feel that in the case of vinyl chloride where the best test procedures are not yet established it is even more important not to prematurely attempt to define the examination protocol.

Similarly in the case of bis-chloro-methyl ether, a very potent carcinogen, where the primary risk in man appears to be cancer of the lung, the standard calls for a periodic physical examination but does not specify that it should be directed to any particular organ system.

In summary we feel that at least until the effects of vinyl chloride exposure in man are better understood and the best test procedures much better defined it would be prudent to allow the examining physician to determine which tests are appropriate in each case and on the basis of his over all evaluation of the employee's health determine whether his work assignment should be changed.

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We feel that the adoption of a medical surveillance standard similar to that already promulgated for the other carcinogens would best accomplish this.

Should the administrator feel that a different and specific medical surveillance standard be required, we would urge the deletion of ( ) for the reasons mentioned above, and provision made for periodic up-dating of the examination protocol as new information or experience may dictate.

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within our industry.

It is only natural that an unexpected, serious problem like the one we have experienced would overshadow the good that has resulted from the production and use of vinyl chloride and PVC.

The initial impetus for the growth of these materials in the United States came from the requirements of national defense in World War II.

The fire resistant properties of PVC made it a superior insulation for electrical wiring for naval vessels and other military applications. It provided a degree of protection against fire that had not previously existed. There is no doubt that these PVC uses helped save many lives during the War and since then in similar military and commercial applications.

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