

AMERICAN INDUSTRIAL HEALTH

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COUNCIL background information

PLAINTIFF'S
EXHIBIT
AL-1031

What is the American Industrial Health Council?

American Industrial Health Council is a newly-formed organization of American companies which are coordinating their scientific and administrative resources to develop new, practical standards for employee health in the industrial workplace.

Who are the members of AIHC?

As of December 1st, 1977, AIHC was composed of thirty-seven companies.

Although the organization's early membership has been concentrated in the chemical industry, virtually all American industries are expected to be represented in AIHC because new worker health standards are of critical importance across the American industrial spectrum.

What kind of support does AIHC receive from its member companies?

The most important support is the contribution of scientific personnel and data for the planned formulation of new worker health standards. Member companies are also contributing other personnel and the financial support necessary to coordinate this important activity.

Is there a specific or immediate task for AIHC scientific and administrative personnel?

There is indeed.

It is to assist the U.S. Occupational Safety and Health Administration in developing a rational and practical standard for regulating carcinogens in the workplace.

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The OSHA categorization scheme, according to AIHC scientists, is overly simplistic, ignores differences in metabolic pathways and detoxification mechanisms, and rejects the important concept of a dose-response relationship.

As proposed, the OSHA standards would obligate OSHA to consider banning such substances as table salt, gold, several common sugars, selenium (a human nutrient) and even asphalt from the American workplace.

How will AIHC help develop employee health standards for the workplace?

Relating to the proposed OSHA carcinogen regulation, AIHC will first gather the best scientific data available on the subject. Papers are already in preparation on subjects such as:

- Massive Dose And Its Effect On Metabolism

- Potency And Latency Period

- Tumorigenicity And Carcinogenicity

- Extrapolation Of Animal Data To Man

- Risk Analysis

- Zero Risk—Impossibility Of No Exposure

Leading independent scientists from across the country and around the world will be invited to present their views on the proposed OSHA standard as well.

Data is also being gathered on the likely economic burden of the OSHA standard. This could include the cost of repeated complete physical examinations of employees; extensive new record-keeping; expensive engineering controls; new monitoring equipment; much wider use of respirators; and even the possibility of isolating plant lunchrooms.

Scientific, economic and other data gathered by AIHC will be made available to any interested company. AIHC can also assist companies in using such scientific and economic data in testimony during OSHA's 1978 hearings on the proposed carcinogen regulations.

What are the key dates in the development of OSHA's carcinogen regulatory process?

Subject to change with little notice, the key dates in the process are:

January 30th — Deadline for submitting written comments or notices of intent to appear at the public hearings as well as copies of the actual hearing testimony.

March 15th — Date by which OSHA must file testimony and comments. Since this date is six weeks after the deadline for industry and other comments, OSHA currently has the opportunity to rebut such comment when it files.

April 4th — Beginning of public hearings.