AUG 2 9 1977

UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS
P.O. BOX 8004, SOUTH CHARLESTON, W VA 25303

SOUTH CHARLESTON PLANT

August 24, 1977

CONFIDENTIAL
Subject to Protective Order in
Ross v. Conoco, Inc., No. 90-4837
14th Judicial District Court
Calcasieu Parish, Louisiana

Dr. T. R. Torkelson
Dow Chemical Company
2030 Dow Center
Midland, Michigan 48640

Subject: Equitable Environmental Health, Inc. Epidemiological Study of Vinyl Chloride Workers

Dear Dr. Torkelson:

I have reviewed the subject report and have the following comments:

1. The report in general is much improved over the previous draft. The summary and conclusions section is poor in that it still remains too preoccupied with past reports. The primary reference to the first report should be we have increased the number of person years by over fifty percent and instead of seeing outstanding peaks in the SMR's for some causes there has actually been a peak reduction.

2. Vinyl chloride related disease has certainly not reached epidemic levels in the industry if after a study of this magnitude the strongest statement is that there is still support for the hypothesis that vinyl chloride is a weak general carcinogen.

3. The most apparent conclusion is that epidemiology as presently practiced is too gross a tool to pinpoint a vinyl chloride problem with any certainty. Does the loss of 36 deaths from all other causes classification and the gain of 20 in all malignancies indicate a problem or does it indicate that medicine is now doing a better job in determining the cause of death assuming an overall SMR of 89.

4. The second paragraph on Page 6 seems to work very hard at being thoroughly confusing, particularly the first sentence. This should be clarified.

5. The allocation of the missing 38 death certificates to other known causes instead of simply showing it as an unknown may be common practice but the least Equitable Environmental Health, Inc. should do is to stress that all SMR's are conservative values. The odds that a death caused by a neoplasm is untraceable are poor as compared to being run over by an automobile in Washington.

In general, the summary and conclusions should accentuate the positive, discuss the in between and not try so hard to accentuate the negative. I am for winding up this study quickly even if we have to accept the report as is.

Very truly yours,

R. N. Wheeler, Jr.

CONFIDENTIAL
Subject to Protective Order in
Rose v. Conoco, Inc., No. 90-4837
14th Judicial District Court
Calcasieu Parish, Louisiana

cc: Dr. Z. B. Bell
Dr. W. D. Harris
Dr. M. N. Johnson
Mr. H. L. Kusnetz
Dr. W. M. Smith
Dr. J. T. Seawell

RNWJr./pm