

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

MARY A. DENDINGER, et al., and
ETTA W. WALLACE, et al.,

Plaintiffs,

vs.

CHRYSLER PLASTIC PRODUCTS CORPORATION,
et al.,

Defendants.

CASE NO. C87-7117
Hon. Nicholas J. Walinski

AFFIDAVIT

STATE OF FLORIDA)
 : ss.
COUNTY OF BREVARD)

Channing R. Meyer, M.D., being first duly sworn, deposes and
states as follows:

I, Channing R. Meyer, M.D., am a doctor of medicine, board
certified in the specialty of internal medicine. I am an Associate Professor
of Clinical Environmental Health and Director of the Occupational Health
Clinic, Department of Environmental Health, University of Cincinnati College
of Medicine. A true and accurate copy of my curriculum vitae, revised
November, 1985, is attached hereto.

Prior to executing this affidavit, I have reviewed the
videotape trial testimony of Herman Dendinger, the videotape trial testimony
of Fred Wallace, the medical records of Herman Dendinger, the medical records

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of Fred Wallace and the medical literature concerning the adverse health effects resulting from animal and human exposure to vinyl chloride. The opinions set forth in this affidavit are based on my review of these materials and on the totality of my education, training and experience as an analytical chemist, a research biochemist, an internal medicine physician and an occupational medicine specialist. Each of the opinions contained in this affidavit is to a reasonable degree of medical and professional certainty.

The purpose of this affidavit is not to posit all of my opinions concerning vinyl chloride and its role in the illnesses and deaths of Dendinger and Wallace, but to briefly acquaint the reader with vinyl chloride and some of its known, adverse health effects.

Vinyl chloride, also known as VCM, is easily absorbed by human beings through the lungs, from the gastrointestinal tract and via the skin. It is excreted as unchanged VCM (up to 90%) and the rest is metabolized primarily in the liver. VCM can be acutely toxic producing first, euphoria then somnolence and finally unconsciousness and even death. VCM also has a number of chronic toxic effects associated with a longer term, lower dose exposure. It is a known neurotoxin, it causes angioneurotic disorders (i.e., Raynaud's phenomenon), skin changes (scleroderma-like changes) and acro-osteolysis (bone changes in the digits of the hands). There have been pulmonary disorders attributed to VCM and PVC inhalation and minor blood disorders as well. VCM has been shown (after metabolic activation) to effect invitro mutagenic effects on bacteria, yeasts and cultured mammalian cells.

In cases of VCM poisoning, changes in the liver can be observed, primarily hepatomegaly. Liver fibrosis can develop in persons exposed for longer periods (2-20 years). However the most important feature

of VCM to date was the discovery of its relationship to an extremely unusual tumor of the liver called angiosarcoma, hemangioblastoma, hemangioendothelioma or angiomatous mesenchymoma. This relationship was first considered in the early 1970's and reported in depth in 1974 and since quite frequently. More recently epidemiologic studies have linked other types of cancer to VCM or PVC exposures, including brain tumors and cancer of the gastrointestinal tract.

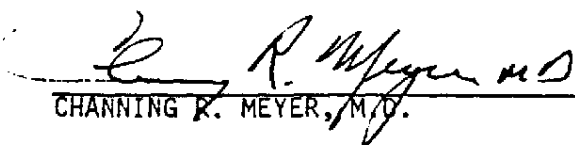
The National Institute of Occupational Safety and Health (NIOSH) and the Occupational Safety and Health Administration (OSHA) first published guidelines in 1974 as to the hazards of VCM and proposed medical monitoring protocols to be used in following workers exposed to VCM. These guidelines were precipitated by a series of articles published in 1974 associating the workplace exposures to VCM with the development of the unusual liver tumors mentioned above, mainly angiosarcoma. Creech et al. first described the liver tumors that occurred in the early 1970's at the B.F. Goodrich plant in Louisville, Kentucky, although other investigators had previously related other problems (acro-osteolysis) with VCM exposures several years before. There had also been strong evidence in the animal literature published in 1971 that VCM was an animal carcinogen.

These and other studies give clear evidence that VCM is a human carcinogen and this information was widely known in the medical and scientific community by 1974 and certainly strongly suspected before that time based on the animal research. The wealth of evidence both from the human and animal data available in 1974 and before would have dictated that strong, explicit warnings should have been given to workers involved with VCM

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or unfabricated PVC as to the potential hazards and that medical surveillance programs and personal protective programs of substantial substance should have instituted at that time to address those issues.

Further affiant sayeth naught.

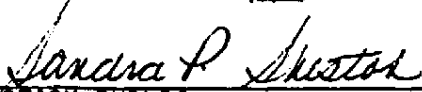

CHANNING R. MEYER, M.D.

STATE OF FLORIDA

COUNTY OF *Brevard*

1987.

Subscribed and Sworn to before me this *14* day of September,


NOTARY PUBLIC

Notary Public State of Florida at Large
My Commission expires Feb. 18, 1990

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CERTIFICATION

This is to certify that a copy of the foregoing instrument was served upon all parties in the foregoing cause by sending a copy of same by ordinary mail with return receipt addressed to each of them at their respective addresses as shown on the return receipt by the clerk of the court.

15th day of September 1987
MURRAY & MURRAY CO., L.P.A.

By *Frederic J. Belli* Clerk of Court

CURRICULUM VITAE

CHANNING R. MEYER, M.D.

Channing R. Meyer, M.D.
243 Greendale Ave.
Cincinnati, Ohio 45220

DOB: April 20, 1945
Married

EMPLOYMENT HISTORY

September 1985 - Present:	Associate Professor Clinical Environmental Health; Director Occupational Health Clinic, Department of Environmental Health, University of Cincinnati College of Medicine.
July 1978 - Sept. 1985:	Assistant Professor of Environmental Health; Director Occupational Health Clinic, Department of Environmental Health, University of Cincinnati College of Medicine.
May 1976 - June 1978:	Chief, Medical Section, Hazard Evaluation and Technical Assistance Branch, NIOSH: responsible for medical investigations related to the national hazard evaluation and technical assistance program.
Jan. 1976 - May 1976:	Medical Officer, NIOSH.
July 1974 - Jan. 1976:	General Internal Medicine Physician for Health Maintenance Plan, Cincinnati, Ohio.
1972 - 1974:	Emergency room physician at Sharonville Occupational Clinic, Deaconess Hospital and Mercy Hospital.
1971 - 1972:	Insurance physicals for numerous companies.
1967 - 1971:	Research biochemist for the Federal Government Environmental Protection Agency. Designed and carried out experiments on animals that tested the effect of pollutants, especially on fatty acid turnover of pulmonary surfactant.
1964 - 1967:	Analytical chemist for the Federal Government Abatement Section of Air Pollution Control. Analyzed air samples collected from different areas of the country with air pollution problems.

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EDUCATION

1977 Mini-residency in Occupational Medicine, University of Cincinnati College of Medicine, Department of Environmental Health, Board Eligible in Occupational Medicine.

1975 Board Certification from the American Board of Internal Medicine

1971 - 1974 Good Samaritan Hospital - Internal Medicine residency. Recommended to take American Board of Internal Medicine exam.

1967 - 1971 University of Cincinnati, College of Medicine - M.D.

1963 - 1967 University of Cincinnati - B.A. Chemistry, graduated cum laude, cumulative point average 3.25/4.0.

ORGANIZATION MEMBERSHIPS

Member Physicians for Social Responsibility, Founder Cincinnati Chapter of PSR and Chairman 1980-1982.
 American College of Physicians
 American Occupational Medical Association
 Past member Cincinnati Environmental Advisory Council (EAC)

ACADEMIC RESPONSIBILITY

Director, Occupational Health Clinic
 Course Director, Preventive Medicine in Clinical Practice for second year medical students 1978-1980.
 Co-course Director, Introduction to Clinical Practice II (ICPII) for second year medical students 1980-1983.
 Instructor in Physical Diagnosis for first and second year medical students 1978-present.
 Course coordinator for Preventive Medicine portion of Introduction to Clinical Practice II (ICPII) for second year medical students 1980-present.
 Participation in teaching the occupational residents via conferences, discussion groups and clinic sessions in the Occupational Health Clinic.
 Course co-coordinator for Introduction to Computers, computer systems, and applications in occupational and environmental health, 1984.
 Course coordinator, Occupational Medicine for the Non Physician; Environmental Health departmental short course, 1984.

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COMMITTEES

Member Year II Curriculum Committee 1978-present
Member Integrating Curriculum Committee 1983-present
Member Environmental Health Seminar Committee
Member Sophomore Medical Student Promotions Board 1978-1983.
Member American Medical Association Advisor Panel on Reproductive Hazards in the Workplace.

FUNDED GRANTS

Co-investigator, Grant number 15-84-73: "Assessment of the Reproductive Status of Male Waste Water Treatment Workers", March of Dimes; two years funding.

MEETINGS AND PRESENTATIONS

Served as Conference Coordinator at NIOSH National Symposium on DBCP, October 1977.

American Academy of Occupational Medicine meeting, October 28, 1980.
"Effects of Carbon Disulfide Exposure on Semen Quality". San Francisco, California.

Presentation at NIOSH Symposium on Occupational Medicine, October 20, 1980.
"Investigations of Occupationally Related Reproductive Disorders". Cincinnati, Ohio.

Medical College of Georgia, Conference on the Expanding Role of Occupational Medicine. October 1-3, 1981. "Occupationally Related Disorders of the Reproductive Systems". Charleston, South Carolina.

National Institute of Environmental Health Sciences Conference on Research Needs for Evaluation of the Health Effects From Exposure to Toxic Waste Dumps. October 10, 1981. "Liver Dysfunction in Humans Who Chronically Ingested Water Contaminated by Organic Chemicals Leaching From a Chemical Waste Dump". Research Triangle Park, North Carolina.

American Industrial Hygiene Conference, June 8, 1982. "Male Reproductive Hazards: Screening Questionnaire Designed to Aid in Determining Male Populations to be Selected for Indepth Study Regarding Reproductive Hazards". Cincinnati, Ohio.

National Association of Medical Examiners National Meeting. February 14-16, 1983. "Environmental Hazards of Interest to the Forensic Pathologist". Cincinnati, Ohio.

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Rocky Mountain Center for Occupational and Environmental Health 5th Annual Conference. "Reproduction the New Frontier in Occupational and Environmental Health Research". April 5-8, 1983. "Critical Review of Occupational Studies of Male Infertility". Park City, Utah.

Kentucky Medical Association Meeting. September 21, 1983. "Male Reproductive Hazards in the Workplace". Louisville, Kentucky.

Ohio Valley Section of the American Industrial Hygiene Association Meeting. Reproductive Hazards: A symposium: "Occupational Exposure to Reproductive Toxins". October 17, 1985. Cincinnati, Ohio.

PUBLICATIONS

NIOSH publications Health Hazard Evaluation and Technical Assistance Program

<u>HHE Number</u>	<u>Date</u>	<u>Title</u>	<u>Toxic Substance</u>
74-98-399	6/7/77	The Goodyear Tire & Rubber Co. Plant No. 1, Akron, OH	Benzene
75-147-318	8/16/76	Westinghouse Electric Corp. East Pittsburgh, PA	Epoxy Resins
75-150-378	4/15/77	Reinell Boats, Inc. Poplar Bluff, MO	Styrene, other organics, Fiberglass
75-183-303	6/30/76	S.W.S. Silicone Corp. Div. Stauffer Chemical Co., Adrian, MI	Amorphous Silica
76-1-388	4/26/77	Bohn Aluminum & Brass Corp. Danville, IL	Cadmium
76-9-345	11/30/76	W.R. Case & Sons Cutlery Co. Bradford, PA	Wood, leather, metal dusts
76-13-316	7/30/76	Cargill Elevator-Terminal 4 Portland, OR	Grain dust, Fumigants
76-15-308	7/28/76	Department of Anesthesia, Northwestern University Medical School, Chicago, IL	Waste anesthetic gases

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PUBLICATIONS-continued

76-18-288	4/26/77	Westinghouse Electric Corp. Bloomington, IN	Polychlorinated biphenyls
76-63-487	5/17/78	BASF Wyandotte Corp. South Kearny, NJ	Vinylidene chloride
76-93-477	4/27/78	General Electric Philadelphia, PA	Multiple exposures
76-102-374	3/31/77	Domore Office Furniture, Inc.	Spray painting, dust, cooling lubricants
76-111-410	8/31/77	Texaco, Inc. Port Arthur, TX	Epidemiology of heart disease, possible organic solvent exposure
76-2-404	7/29/77	Johns-Manville Sales Corp. Lompoc, CA	Asbestos, Diatomaceous earth
77-3-420	9/30/77	Essex International	Occupational hysteria
77-22-409	8/23/77	Purex Corp. London, OH	Detergent dust
77-50-419	9/23/77	The Glass Detail Cincinnati, OH	Lead
77-75-494	6/78	Dawe's Laboratories Chicago Heights, IL	Diethylstilbesterol
77-103-474	3/37/78	Occidental Chemical Co. Lathrop, CA	Dibromochloropropane
76-109-351	12/28/76	H. Paul Fanning, D.D.S. Cheyenne, WY	Mercury exposure
79-96		Protective Coating Ft. Wayne, IN	
79-113-728	8/80	Olin Chemical Co. Brandenburg, KY	Toluene diamine

Technical Assistance

76-54	5/31/78	Dept. of the Interior National Park Service Cave Study	Radon daughter radiation exposure
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PUBLICATIONS-continued

76-100	9/30/77	ASARCO East Helena, MT	Lead
7-27	9/30/77	Republic Lead Burning & Equipment Co., Cleveland, OH	Lead
77-48	4/25/77 Closed	Environmental Health Administration Washington, D.C.	
78-13	12/30/77	OSHA Hearings on DBCP Washington, D.C.	Dibromochloropropane
78-15	1/78 closed	Rocky Mountain Academy of Occupational Medicine	Lecture on DBCP
78-16	12/23/77	Kenneth Gereche Philadelphia, PA	
78-25	7/78	Purex Corp. London, OH	Detergent dust

Guidelines for Detection of Hepatotoxicity Due to Drugs and Chemicals, U.S. Dept. HEW, National Institutes of Health, NIH Publication No. 79-313.

Meyer, CR: Semen quality in workers exposed to carbon disulfide compared to a control group from the same plant. Journal of Occupational Medicine, Vol. 23, No. 6, June 1981.

Clark, CS, Meyer, CR, Gartside, PS, Balistreri, WF, Elia, VJ, Majeti, VA, Sprecker, B: An environmental health survey of drinking water contamination by leachate from a pesticide waste dump in Hardeman County, TN. Archives of Environmental Health, Vol. 37, No. 1, January/February 1982.

Meyer, CR: Liver dysfunction in residents exposed to leachate from a toxic waste dump. Environmental Health Perspectives. Vol. 48, February 1983.

Elia, VJ, Clark, CS, Majeti, VA, Gartside, PS, MacDonald, T, Richdale, N, Meyer, CR, Vanmeer, GL and Hunninen, K: Hazardous chemical exposure at a municipal waste water treatment plant. Environmental Research. 32, 360-371, December 1983.

Meyer, CR: Environmental hazards of interest to the forensic pathologist. The American Journal of Forensic Medicine and Pathology. Vol. 4, No. 4, December 1983.

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PUBLICATIONS-continued

Meyer, CR: Progress in Clinical and Biological Research. Vol. 160. Reproduction in The New Frontier in Occupational and Environmental Health Research. Allen R. Liss and Co., New York, 1984.

Whorton, MD, and Meyer, CR: Sperm count results from 861 American chemical/agricultural workers from fourteen separate studies. Fertility and Sterility. vol. 42, No. 1, July 1984, pgs 82-86.

Hope, E, Blackburn, K, Zenick, H, Meyer, C and Rafales, L: Computerized evaluations of human sperm. Biol. Reprod. 1984, 30(1). 176(a292).

Osinbowale, AO, Bhattacharya, A and Meyer, C: A Biomechanical Analysis of Lumbosacral X-rays of Low Back Pain Workers. Abstract. Presented at the Joint Occupational Health Conference in Orlando, FL. 1985. Submitted to Journal of Occupational Med.

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