

MCA

MANUFACTURING CHEMISTS ASSOCIATION

1825 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20009 (202) 483-6126

SEP 30 1974

September 27, 1974

V.C.I.
File
Epidemiology

To: Management Group and
Technical Task Group on Vinyl Chloride Research

Subject: MCA Comments to OSHA re Jellinek Letter

Gentlemen:

The Final Environmental Impact Statement of OSHA on its proposed vinyl chloride standards included, as one exhibit, a letter from Mr. Steven D. Jellinek of the Council on Environmental Quality referring to the epidemiological and toxicological data from the MCA-administered studies. The misleading implications and errors of fact in this letter are sufficiently significant that, at the suggestion of industry representatives, MCA has attempted to correct the record. A copy of Mr. Driver's letter of September 24 to Mr. Stender is enclosed.

Sincerely,



Kenneth D. Johnson, Ph.D.
Secretary
Technical Task Group on
Vinyl Chloride Research

KDJ/mb

Enclosure

RSV 0002173

INFORMATION COPY



MANUFACTURING CHEMISTS ASSOCIATION

1825 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20009 (202) 483-6126

WILLIAM J. DRIVER
PRESIDENT

September 24, 1974

Honorable John H. Stender
Assistant Secretary of Labor
U. S. Department of Labor
Occupational Safety and
Health Administration
Washington, D. C. 20210

Dear Mr. Stender:

The Manufacturing Chemists Association (MCA) is extremely concerned over certain statements appearing in the Final Environmental Impact Statement (EIS) on the Proposed Regulations on Vinyl Chloride. As OSHA did not see fit to make a copy of this document available to MCA, we have only recently learned of the misleading implications in these statements.

The statements in question occur in the letter of Steven D. Jellinek, of the Council on Environmental Quality, to Dr. Daniel Boyd, dated August 5, 1974. Mr. Jellinek erroneously states that MCA "has not seen fit to supply this important data" from the epidemiology study conducted by Tabershaw/Cooper Associates for MCA, and incorrectly identifies the Industrial BIO-TEST Laboratories (IBT) vinyl chloride study as a "feeding study."

Mr. Jellinek proceeds to criticize the IBT data, made available to OSHA concurrently with MCA's receipt of that data, on the grounds that the final statistics will be different from the interim figures. We were aware, at the time a decision was made to keep the Government agencies fully and currently informed, of the hazards of uninformed use and improper interpretation of incomplete and fragmentary data, but judged that the needs of OSHA outweighed the risks to the industry. Mr. Jellinek's comments tend to reaffirm our concern.

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We are particularly concerned over the implications of bad faith imputed to us by the remarks in the first paragraph of page two of Mr. Jellinek's letter. The request of CEQ for retabulation of certain sets of data in the TCA report was conveyed to us by letter of Dr. Warren Muir. MCA requested TCA to determine whether, and to what extent, the desired recomputations could be performed within the time limits set by Dr. Muir. The correspondence involved in this matter is enclosed. At no time did Dr. Muir or CEQ indicate dissatisfaction with the material supplied, nor have they asked us for any additional information. The implication that MCA is withholding adverse data is unwarranted and simply untrue.

Mr. Jellinek is entitled to differ with the experts of TCA as to the optimum design of an epidemiological study, but his comment that "it by design vastly underestimates the rate" remains an unbiased comparison. Certainly, as the TCA study pointed out, there appears to be an increase in the incidence of malignancies with increasing lengths and intensities of exposures to vinyl chloride. Thus rates calculated for more recently recruited employees are not expected to be the same as those for men employed since the early days of the industry. It would be equally improper to assume that the health experience of those now working in vinyl chloride or PVC plants will parallel, a couple of decades from now, the present experience of those who worked under the vastly different conditions that prevailed in the forties and fifties.

In follow-on studies now being discussed with TCA, we hope to improve substantially the percentage of the past work forces that can be traced, and their health status ascertained. In this supplementary study, the entire body of data will be subject to retabulation and analysis, and MCA welcomes the suggestions of OSHA and of CEQ as to data treatment that will best enable them to meet their responsibilities for the protection of the public.

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The Manufacturing Chemists Association has tried to be open and frank with the results of its study projects on vinyl chloride. For the OSHA record to indicate otherwise would be entirely inappropriate. Therefore we request the record on vinyl chloride be corrected with regard to the errors in Mr. Jellinek's letter.

Sincerely,



W. J. Driver

cc: Dr. Daniel Boyd
Mr. Steven D. Jellinek
Mr. Glenn Schweitzer
Mr. Edward J. Baier

RSV 0002176