

ACA INTEROFFICE MEMO

November 7, 1977

A. C. Clark

Subject: Report on Events Leading to Current Status of
Equitable Environmental Health (EEH) Study

On or about February 12, 1977 Dr. T. S. Torkelson contacted the Project Manager and requested a recapitulation of all technical members who had responded by balloting on the additional EEH work on further analyses of epidemiological data. Balloting by Panel members was to have been completed by February 15 at the latest in order that members of the EEH team assigned to this work would not be reassigned to other urgent programs for which EEH had just received contracts.

Dr. Torkelson then estimated the amount of time which would be required for completion of Panel balloting and added to this estimate the time usually required for the return of commitments by the Management Contacts. After evaluating with members of Dow's management the delay which would be incurred if the return of ballots and commitment forms proceeded as expected, and further evaluating the importance to the chemical industry and, in turn, to the technical literature of an EEH report wherein critical cohorts would be more accurately grouped thereby yielding a more valid statistical analysis of the epidemiological data, Dr. Torkelson secured his management's immediate authorization to guarantee payment of the additional EEH work. Therefore, on or about February 23, 1977, Dr. Torkelson called Mr. R. S. Davis, Regional Manager of EEH and (1) authorized that EEH proceed immediately with the work necessary for the revision of the final report, (2) stated that Dow Chemical U.S.A. would guarantee payment for this additional work, (3) secured a preliminary estimate from Mr. Davis of approximately \$10,000, and stated further that he, Dr. Torkelson, would confirm in a letter to Mr. Davis the areas in the then existing report draft requiring further study and revision evolving from Panel critiques. The Project Manager was

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informed of the foregoing action on or about February 24, 1977 in a telephone call from Dr. Torkelson.

On March 11, 1977 Dr. Torkelson confirmed in a letter to Mr. Davis actions outlined in the preceding paragraph. A copy of the letter to Mr. Davis has not been made available to MCA.

After Panel balloting endorsed the above mentioned additional work and prior to the preparation of commitments, Mr. Davis was requested to send to the Project Manager confirmation of his original estimate to Dr. Torkelson. The Project Manager requested that Mr. Davis submit a complete estimate with appropriate cost analyses and a description of the scope of the work to be accomplished under the EEH proposal covering their additional studies. This was done in Mr. Davis' letter dated August 18, 1977 (see copy attached).

The consensus of opinions expressed by Panel members indicated that neither pertinent government agencies, concerned academicians, nor the public would be properly served by only approximately 10 extra copies of the final report (over and above those copies required for the Research Coordinators and for Panel Distribution). Neither was it feasible for MCA to go into the "reports reproduction business". As a result, the Chairman requested that EEH supply 50 extra copies for a cost of \$300. His prompt action on this particular matter was necessitated by a call from Mr. Davis wherein Mr. Davis stated that were there any loose ends requiring prompt action they should be handled immediately as EEH was in the process of closing its Berkeley office. All operations formerly handled by Berkeley will now be handled by their Rockville office.

Therefore, to Mr. Davis' total fixed cost (not to exceed \$10,000) was added a cost of \$300 to cover the 50 additional copies of the final report. The cost of these additional copies was reflected in the total amount (\$10,300) entered on the commitment form sent to the Management Contacts on September 2, 1977.

All of the requested copies of the final report have been received. The required copies have been sent to the Vinyl Chloride Research Coordinators and to members of the Technical Panel. The final report has not been accepted by either the Research Coordinators nor the Technical Panel.

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As of this date, the independent Contractors of companies have agreed that the additional SSN work be taken out of existing funds. Currently we are waiting responses from companies.

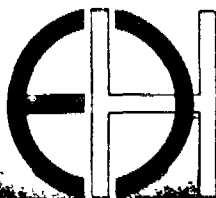
J. T. Ewell

JTW:ec

cc: Mrs. A. Howard

Mr. J. C. Van Horn

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EQUITABLE
ENVIRONMENTAL
HEALTH
INC.

Chicago
Houston
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Washington, D.C.

A Subsidiary of The Equitable Life Assurance Society of the United States

RICHARD L. DAVIS
Regional Director

August 18, 1977
EEH/S-77L-386

Dr. Joseph T. Seawell
Manufacturing Chemists Association
1825 Connecticut Ave., N.W.
Washington, D.C. 20009

Dear Dr. Seawell:

This is in response to our various conversations and correspondence relative to completion of the Final Report on the Mortality Study of Vinyl Chloride Workers, a draft of which was forwarded to the Manufacturing Chemists Association for review.

The following proposal specifies the necessary effort required to accommodate the suggestions of the reviewing committee and recommendations put forth by Dr. W. Clark Cooper, all of which are outside the scope of the agreement between Equitable Environmental Health, Inc. and the Manufacturing Chemists Association for a Supplementary Analysis of the Mortality of Vinyl Chloride Workers, dated April 28, 1975.

The Scope of Work to be accomplished under this proposal includes both the suggestions of the review committee and those of Dr. Cooper, agreed to during the various conversations referenced above.

- I. Include a more adequate description of study methods as reflected in the initial report (dated May 3, 1974) so that this final report can "stand alone" rather than as a supplementary report.
- II. Include a description of the plants involved in the study, including how many made VCM, how many made only PVC, and how many made other polymers.
- III. Present the geographical distribution of the plants in the study.
- IV. Prepare a table to present data on individuals engaged only in the production of PVC.
- V. Prepare tables which present information about the study population on the distribution by birth-years, the distribution of years of first employment, and year-of-birth/year-of-observation used in person-year distribution.

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- VI. Add to the tumor case lists the hire dates, death dates, and integrated exposures.
- VII. Retabulate the following tables so as to reflect a single population: 3 and 4, 6 and 7, 8-18 with 19-24, 25 and 27, and 26 and 28.
- VIII. Delete the last four columns of Table 5, and the columns on type of facility and estimate of exposure in Tables 29 and 30.
- IX. Redraft the text of the report to reflect these changes plus the editorial comments contained in MCA's letter of December 13, 1976.
- X. Submit copies of the newly drafted report to the review committee for comments.
- XII. Prepare and submit copies of the Final Draft Report to the review committee reflecting any required changes.
- XIII. Submit 40 copies of a Final Report.

The above described Scope of Work requires significant retabulation of data, the preparation of a number of new tables, and a material redrafting of the report text. Following is our estimate of the cost related to this effort. Personnel services are presented by categories and composite hourly rates for each category have been applied to arrive at personnel costs. Direct costs have not been detailed since the total amount is relatively insignificant in relation to the total cost. The bulk of the direct cost is for reproduction of the various drafts and the final report to be submitted.

<u>Estimated Costs</u>			
<u>Services:</u>	<u>Hours</u>	<u>Composite Rate</u>	<u>Cost</u>
Professional Staff			
Physician/Epidemiologist	37		
Statistician	115		
Total Professional Staff	152	\$44.42/hr.	\$6,752
Technical Support Staff	76	\$17.19/hr.	\$1,306
Secretarial/Typist	56	\$16.39/hr.	\$ 918
Project Management	14	\$51.73/hr.	\$ 724
Total Services	298		\$9,700
<u>Other Direct Costs:</u>			
Reproduction, Telephone, Postage, etc.			\$ 500
TOTAL FIXED COST (not to exceed)			\$10,200



The above described effort and the associated costs will bring to completion this most important study which had its genesis in mid-1973. In more than one instance, events overran the effort which necessitated changes in approach and technique. This created difficulties which were not always under the control of EEH or MCA.

As we approach the end of the project, it might be appropriate to review briefly several of the significant milestones:

Original Agreement Executed	June, 1973	\$71,345
Travel Expense Amendment	August, 1973	\$ 3,950
Increased Follow-up Amendment	March, 1974	<u>\$ 5,250</u>
Total for Initial Study		\$80,545

A final report on this initial study was delivered to MCA on May 3, 1974.

Additional-Plants Agreement	November, 1974	\$10,350
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A final report of this study was delivered to MCA on May 30, 1975.

Supplemental-Population Study Agreement	April, 1975	\$32,000
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The first draft of a report of the Supplemental Study was delivered to MCA on September 22, 1976.

Total for All Studies		\$122,895
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It should be noted that all of the work enumerated above was performed by EEH (or its predecessor company) under Fixed Price agreements. In order to fulfill its fixed-cost obligation to MCA, it was necessary for EEH to write-off \$15,042 of costs at the end of 1976. In light of this action, we do not feel we are able to absorb additional unreimbursed costs. It is, therefore, necessary for us to require the additional funds requested in this proposal to complete the Final Report in accordance with the requests of the review committee.

EEH is very pleased to have had this long association with MCA and feels that we have pursued the projects in a diligent manner. The subject matter has been of intense interest to both the scientific community and the general public. As mentioned earlier, rapidly developing information has caused shifts in study emphasis and analysis, making budget control extremely difficult. Extraneous demands with very short time responses have complicated the project's smooth flow. Considering all of these factors, we feel a real sense of pride to have been able to bring the study to a successful completion. We hope the members of MCA share that satisfaction with us.



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Dr. Joseph T. Seawell
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August 18, 1977

Since it is the expressed desire of MCA that a paper reporting on the data contained in the Final Report be prepared for scientific publication in the spring of 1977, there is some need to expedite the completion of the project. We will greatly appreciate your consideration of this proposal and we shall await an early response.

Sincerely,

Richard L. Davis

RLD:bw

cc: Theodore Torkelson, Sc.D.
Dow Chemical Corporation

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VINYL CHLORIDE - A. C. Clark letter of 9/2/77

EEH - Epidemiological Studies - Review statistical
data - \$10,500

	DATE	YES	NO
Air Products	9/1/77	✓	
Allied	9/1/77	✓	
BP Chemicals	9/1/77	✓	
Borden	9/1/77	✓	
Certain-Teed			
Continental Oil	9/22/77	✓	
Diamond Shamrock			
Dow	9/1/77	✓	
Ethyl	9/1/77	✓	
Exxon	9/1/77	✓	
Firestone	9/1/77	✓	
General Tire	9/1/77	✓	
Georgia-Pacific			
B. F. Goodrich	9/1/77	✓	
Goodyear	9/1/77	✓	
W. R. Grace	9/12/77	✓	
Great American	9/12/77	✓	
Gulf	9/22/77	✓	
Hooker	9/1/77	✓	
Keysor-Century			
Monsanto			
Olin			
Pantasote	9/1/77	✓	
PPG	9/1/77	✓	

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	Date	YES	NO
Robintech			
Shell			
Stauffer			
Tenneco			
Union Carbide	1/11/77	✓	
UNIROYAL	4/1/77	✓	

By phone.
 Confidential source
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 See inter. 1/11/77