

UNION CARBIDE CORPORATION
HEALTH, SAFETY & ENVIRONMENTAL AFFAIRS

P-2

39 OLD RIDGEBURY ROAD
DANBURY, CT 06817-0001

TO: SUBSTANTIAL RISK EVALUATION BOARD

DATE: September 10, 1986

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COPY: R. E. Bollinger
H. L. Greenberg

SUBJECT: Vinyl Chloride
Epidemiology Study

Attached for your file is a copy of the "FYI" letter concerning the CMA - sponsored epidemiology study of vinyl chloride workers which was sent to EPA today.

Very truly yours,



W. C. Kuryla
Secretary, SREB

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Attachment
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UNION CARBIDE CORPORATION 39 OLD RIDGEBURY ROAD, DANBURY, CT 06817-0001
COMMUNITY AND EMPLOYEE HEALTH, SAFETY
AND ENVIRONMENTAL PROTECTION PHONE (203) 794-6251

CORNELIUS C. SMITH, JR.
VICE PRESIDENT

Certified Mail
Return Receipt Requested

September 9, 1986

Document Control Officer
Information Management Division
Office of Toxic Substances (WH-557)
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Sir or Madam:

Enclosed is a draft report by Environmental Health Associates, Inc. entitled "Epidemiologic Study of Vinyl Chloride Workers", prepared for the Chemical Manufacturers Association. The draft report states at (i):

The study confirmed that the vinyl chloride workers experienced significant mortality excesses in angiosarcoma (15 deaths), cancer of the liver and biliary tract (SMR - 641), and cancer of the brain and other central nervous system (SMR - 180). In addition, the study also found a significant mortality excess in emphysema (SMR - 179).

While Union Carbide Corporation does not agree, for the reasons stated below, that Section 8(e) of the Toxic Substances Control Act applies to the information transmitted herein, this submission should be deemed to discharge any Section 8(e) responsibilities that might exist and should be processed in accordance with EPA's "substantial risk" procedures.

Union Carbide believes that the information herein on excess cancers (other than possibly biliary tract cancer) observed in vinyl chloride workers is corroborative of well-established adverse effects already documented in the public literature. The information on excess emphysema observed in vinyl chloride workers is not reliably ascribed in the report to exposure to vinyl chloride because of: (1) potential problems involved in the cause of death coding for emphysema; (2) the manner in which the diagnosis of emphysema was

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made (clinically or pathologically); (3) the possible contribution of other factors such as smoking and geographical variation; and (4) the absence of precedents in experimental animals. You will also note that there was an apparent excess of biliary tract cancer in this cohort in addition to the excess of angiosarcoma of the liver. This apparent excess may be explained by failure to diagnose angiosarcoma properly.

We recommend that further information on this study should be obtained from Dr. H. C. Shaw of the Chemical Manufacturers Association (202-887-1100).

Very truly yours,



C. C. Smith, Jr.
Vice President
Community and Employee Health, Safety
and Environmental Protection

CCS:pmb
Attachment

cc: Dr. W. E. Chambers
Dr. W. C. Kuryla

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Draft

Epidemiologic Study of
Vinyl Chloride Workers

Prepared for
Chemical Manufacturers Association

(COVER PAGE ONLY)
COMPLETE REPORT
SENT TO EPA

Environmental Health Associates, Inc.
520 Third Street, Suite 208
Oakland, CA 94607

August 5, 1986

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