



BY MESSENGER

CHEMICAL MANUFACTURERS ASSOCIATION

March 19, 1980

Mr. Frank D. Kover - TS 792
Chief
Chemical Hazards Identification
Branch
Assessment Division
Environmental Protection Agency
401 M Street, S.W.
611 East Tower
Washington, D.C. 20460

Dear Mr. Kover:

On January 14, 1977, Mr. Albert Clark forwarded to Mr. Robert McGaughy of EPA, on behalf of the Manufacturing Chemists Association (now the Chemical Manufacturers Association), a copy of the protocol and the 23-month status summary for the Association-sponsored research on vinyl chloride at Industrial Bio-Test Laboratories (IBT). Mr. Clark stated in that letter that the final report was expected to be submitted soon, and when available, would be forwarded to the Agency.

As you know, all testing undertaken at IBT has come under a cloud. In particular, serious flaws were discovered in the vinyl chloride study, and no final report of the IBT study was ever issued. The Association undertook to determine whether the vinyl chloride study could be validated through an audit of the pathology by Experimental Pathology Laboratories (conducted by Dr. William Busey). Dr. Busey subsequently submitted a report of his audit to the Association on January 9, 1979. It was reviewed by an Association task force and, because it was part of a larger audit (including a review of compliance of IBT with good laboratory practices), was not further distributed at that time. Unfortunately, because of the interim change in the management of the Association and the extraordinary increase in the scientific work of the Association caused by the Toxic Substances Control Act and related environmental legislation, we failed to send it to the Agency as a follow-up to Mr. Clark's letter of January 14, 1977.

CMA 004575

Formerly Manufacturing Chemists Association—Serving the Chemical Industry Since 1872.

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Recently, the Association has established a task force to oversee and coordinate all scientific testing projects. In the course of reviewing existing projects, this group discovered that we had not made Dr. Busey's audit report on the vinyl chloride study available to the Agency. Accordingly, I am enclosing a copy of the audit report as a follow-up to Mr. Clark's letter of January 14, 1977.

As shown in the interim report sent to the Agency in January, 1977, three suspect brain tumors were noted in male rats at the high dose level. These brain tumors, plus one at the lower dose level, were confirmed by pathology subsequently conducted by IBT and then by Dr. Busey. Unfortunately, not all of the brain specimens were retained by IBT and not all retained specimens were examined. The Association has therefore concluded to determine whether additional information can be obtained from whatever brain specimens remain at IBT from this highly-flawed study by conducting histopathological examination of all remaining brain tissues. We have not identified any other findings that would appear to warrant further attempts to salvage other information from this study.

We apologize for failing to follow-up on Mr. Clark's earlier letter, and wish to assure you that we will, in the future, keep you apprised of any additional relevant information as it becomes available to us.

While CMA does not itself have a Section 8(e) reporting obligation, and while it appears that this information would not be reportable under Section 8(e) in any event, pursuant to our earlier commitment we are submitting it to the Agency.

Sincerely yours,

Hasmukh Shah

Hasmukh C. Shah, Ph.D.
Director, Special Projects

cc: (with enclosure)
Mr. Robert McGaughy
Office of Research &
Development
Environmental Protection Agency

CMA 004576

FOLLOWING SENT TO ATTACHED LIST OF GOVERNMENT AGENCIES

CMA 004577