

SHELL OIL COMPANY

SHELL CHEMICAL COMPANY

DEER PARK MANUFACTURING COMPLEX

PLAINTIFF'S EXHIBIT

SH-2016

DATE SEPTEMBER 15, 1978

TO SAFETY INSPECTORS

FROM MANAGER SAFETY - REFINERY
DEER PARK MANUFACTURING COMPLEX

SUBJECT HEALTH HAZARDS

*YES
Asbestos material
in tank*

I ask you to read this article because I feel it highlights several principles which are directly applicable to our business of protecting workers from health hazards. This is certainly not the best article ever written on cancer and the accuracy of the numbers is not my concern.

One principle referenced is that exposure to asbestos fibers is a health hazard. There is clear evidence that exposure to asbestos fibers increases one's risk of developing lung cancer.

Another principle which you are all aware of is that the law requires that the employer protect the worker from overexposure to asbestos fibers. Reference General Industry Standard 1910.1001.

A third principle that is inferred is that OSHA is dedicated to and will not be discouraged from enacting into law a generic carcinogen standard to expedite regulating suspected cancer-causing agents in the workplace. The generic carcinogen standard will most likely be opposed to ensure a cost-benefit analysis; however, it is my feeling that it is only a matter of time before the standard becomes a reality.

I propose that, as safety professionals concerned with promoting safe and healthful working conditions, we should be on the "leading edge" of defending those principles which will protect workers from the invisible long term health hazards. I speak to your concern for humanity; I address your sense of pride and righteousness.

On the subject of asbestos exposure, our job is to know and enforce the law. Accepted asbestos handling procedures have been documented in a Complex Order to be issued shortly. Deviations from the law and those accepted handling procedures are unacceptable. Your challenge and mine is to convince our employees that compliance with the law is right and is good because it is in the best interest of promoting each employee's health.

M. T. Anderson
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ABS-003983

Work exposure blamed for 20% cancer deaths

WASHINGTON (AP) — Exposure to cancer-causing substances at American work sites may cause at least 20 percent of all this country's cancer deaths — nearly 80,000 persons each year — with asbestos apparently the No. 1 killer, government scientists say.

The new estimates are sharply higher than past figures, which placed the cancer toll from occupational exposure at only 1 percent to 5 percent, Secretary Joseph A. Califano Jr. of the Health, Education and Welfare Department, said Monday.

Indeed, a single substance, asbestos, may account for 17 percent of all cancer deaths annually. Other culprits include arsenic, benzene and vinyl chloride.

Scientists from the National Cancer Institute and the National Institute of Environmental Health Sciences said 20 percent was a "conservative" estimate of the cancer toll at work sites, estimating it

could run as high as 38 percent.

The scientists based their findings not on new medical research, but on new statistical analyses of the number of workers exposed to cancer-causing chemicals on the job and their risk of incurring cancer.

Califano told an AFL-CIO conference on occupational safety and health about the new estimate and released a five-page draft summary of the study.

HEW scientists are putting the study into final form to submit to the Labor Department's Occupational Safety and Health Administration by Friday.

OSHA is preparing new standards for regulating hundreds of known or suspected cancer-causing agents at work places in hopes of speeding federal action to ban or restrict them.

Critics of the plan have said it could

(See 20% of CANCER, Page 4)

20% of cancer deaths may be related to jobs

(From Page 1)

cost industry billions of dollars, and some have said the standards are not needed because the incidence of occupational cancer was low.

But Dr. David P. Rall, director of the National Institute of Environmental Health Sciences, said scientists who made the low estimates "just haven't looked carefully enough at the problem."

The new study singles out asbestos, the fire-resistant mineral used in a host of fields from construction to auto brake lining repair, as the worst offender.

HEW began a campaign in April to alert the estimated 8 million to 11 million Americans who have been exposed to asbestos since World War II about its long-term effects.

The HEW study said at least 2.15 million of those workers will die from asbestos-related diseases, or 67,000 a year for the next 30 to 35 years. It blamed asbestos for 17 percent of all cancer cases.

The study says 5.8 million workers were potentially exposed to arsenic, benzene, vinyl chloride, coal tar pitch and coke oven emissions, which could cause 1 percent to 3 percent of all cancers each year.

Some 7.5 million workers potentially were exposed to four other substances, chromium, iron oxide, nickel and petroleum distillates, which could cause 3 percent to 18 percent of the cancers, the study added.

The total for all occupational carcinogens (cancer-causing substances) would be 38 percent, the top-range estimate for the cancer toll.

The National Cancer Institute says 390,000 Americans die from cancer annually. The new 20 percent minimum estimate for all worker deaths from chemicals would mean 78,000 deaths. The number of new cancer cases diagnosed each year is 700,000.

The study listed a dozen occupations in which it said the workers showed excessive cancer rates, but they have not been traced to any single substance.

These included: coal miners, chemists, foundry workers, textile workers, printing pressmen, metal miners, coke by-product workers, cadmium production workers, and lead, rubber, wood and leather workers.

The AFL-CIO convention on worker safety was called to rally opposition to a proposal that would exempt businesses with fewer than 10 employees in non-hazardous industries from inspections by OSHA.